

PSJ10 Exh 11

Memorandum



Subject	Date
Distributor Briefing with Actavis Elizabeth, LLC (RK0146806), on September 12, 2012 (DFN:601.04.2)	NOV 05 2012

To

Joseph T. Rannazzisi
 Deputy Assistant Administrator
 Office of Diversion Control

From

Barbara J. Bockholdt
 Barbara J. Bockholdt, Chief
 Regulatory Section, ODG
 Office of Diversion Control

On September 12, 2012, a meeting was held in Arlington, Virginia at the Drug Enforcement Administration (DEA) Headquarters between DEA and Actavis Elizabeth, LLC (Actavis). Representing Actavis were: Nancy Baran, Director, Customer Service, Jason Chung, DEA Manager, John S. Kaldes, Senior Director Engineering & EHS, Michael R. Clarke, Ethics & Compliance Officer, Americas, and Doug Plassche, Managing Director, NJ Solid Oral Dose (SOD). Representing DEA were: Barbara J. Bockholdt, Chief, Regulatory Section; Staff Coordinator (SC) Leonard Levin, Regulatory Section; Dedra Curteman, Office of Chief Counsel, Jason Hedges, Office of Chief Counsel; Christine Sannerud, Chief, Quota Section; Stacy Harper-Avilla, Chief, Quota Unit; GS Andrew Breiner, and D/I Michael Smilek, both from the Newark Division Office. The purpose of the meeting was to address the manufacturing and distribution practices of controlled substances by Actavis. SC Levin stated he would only concentrate on oxycodone 15mg and 30mg tablets for the purposes of this meeting. Actavis holds the following DEA Registrations: RK0146806 (Manufacturer, NJ), R0146818 (Distributor, NJ), RB0185579 (Manufacturer, NC), RA0231062 (Manufacturer, FL), RA0419552 (Manufacturer, NJ), RA0419540 (Distributor, NJ), and RA0395675 (Manufacturer, NJ).

SC Levin opened the meeting by stating its purpose was both educational and informative. SC Levin stated he would discuss Actavis' responsibilities under the Controlled Substances Act (CSA), their suspicious order monitoring system, their procedures concerning due diligence, knowing their customers, who their customers sell to, and graphs depicting the pharmacies where their products were ultimately dispensed from. SC Levin stated he would be primarily focusing on the distribution of oxycodone 15mg and 30mg tablets by Actavis. SC Levin asked for a representative from Actavis to talk briefly about the firm, their product line, their suspicious order monitoring system and to whom they distribute. Ms. Baran spoke on behalf of Actavis. Ms. Baran stated that Actavis manufactures non-controlled and controlled substances from their locations in New Jersey, North Carolina and Florida. Actavis' corporate offices are located in New Jersey. Ms. Baran stated that as of November 1, 2012, Watson Pharmaceuticals will acquire Actavis and the firm will have a new name. Ms. Baran stated both Actavis and Watson will be applying for new DEA registrations. Watson was not invited to this meeting per Actavis because the acquisition has not yet taken place. Ms. Baran stated Actavis sells some products directly to distributors, but the bulk of their finished products are sent to UPS Supply Chain, which serves as a fulfillment center

for orders placed with Actavis. Ms. Baran stated Actavis remains the owner of the controlled substances while in the possession of UPS Supply Chain. Ms. Baran stated that UPS Supply Chain has their own suspicious order monitoring system. Almost all of Actavis' controlled substances are sent to the UPS Supply Chain location in Louisville, KY. Actavis ships the order to UPS Supply Chain for processing and distribution. Actavis is the owner of the inventory, not UPS Supply Chain. UPS Supply Chain uses their own DEA registration and reports purchases and sales directly to ARCOS. Ms. Baran explained their charge back system. The system enables Actavis to see who their customers are selling their products to and what they are purchasing. Ms. Baran stated that Actavis is just beginning to review their sales through the charge back system. Ms. Baran stated she has visited UPS Supply Chain and been able to review their suspicious monitoring system. UPS Supply Chain has a staff which monitors any suspicious orders of controlled substances. Value Centric is a firm who stores sales data for Actavis which they can review. Recently, Ms. Baran has gone out to visit their large volume customers, such as Cardinal, McKesson and AmerisourceBergen. SC Levin mentioned to Ms. Baran the significance of "Knowing Your Customers". SC Levin stated that the United States (U.S.) consumes more legitimately manufactured controlled drugs than any other country. SC Levin mentioned that 97 percent of hydrocodone that is manufactured is prescribed and dispensed in the United States. SC Levin explained the dramatic increase of prescription drug abuse, which has increased by 400 percent over the past 10 years. SC Levin stated that today more people are abusing prescription medication than are abusing illicit drugs. The abuse of prescription drugs has become a national epidemic.

SC Levin presented a PowerPoint presentation exemplifying the common characteristics and issues associated with the distribution and manufacturing practices by manufacturers and distributors of controlled substances. SC Levin stressed the importance of a manufacturer's due diligence requirements, knowing one's customers, and the detection of suspicious orders. Specifically reviewed were the following:

- Supreme Court Cases and Immediate Suspension Orders
- Closed System of controlled substance distribution
- Establishing the medical necessity for a prescription and/or a distribution to be legal
- The DEA Internet Policy and the Ryan Haight Act
- Policies published by the American Medical Association (AMA) and the Federation of State Medical Boards (FSMB)
- Review of Suspicious Order requirements of Title 21, Code of Federal Regulations
- Knowing one's customer
- Theft and loss reporting
- Recent News Articles regarding actions taken against CVS pharmacies, Cardinal and Walgreens
- System to insure the address, controlled substance schedules and expiration date of customers' DEA registrations prior to shipping them controlled substances
- Recent actions taken by the DEA to suspend or revoke controlled substance registrations of distributors and pharmacies that continue to divert controlled substances into the illicit market

At the conclusion of the PowerPoint Presentation, SC Levin presented graphs documenting the distribution of oxycodone 15mg and 30mg tablets by Actavis Elizabeth, LLC. These distributions were derived from ARCOS reports submitted by Actavis under specific NDC numbers. The graphs revealed a dramatic increase in the sale of oxycodone 15mg and 30mg tablets from 2010 to present with the vast majority being distributed to Florida. The graphs did show a decrease in the amounts of oxycodone distributed in the past six months. SC Levin attributed the decrease to actions taken by DEA in Florida,

the Florida prescription monitoring program, administrative action taken by DEA against registrants and meetings such as this one. Chief Boockholdt explained that the manufacturer that produces oxycodone is just as responsible as the distributor and pharmacy for ensuring that these drugs do not end up in the wrong hands. SC Levin thoroughly discussed the problems associated with pain management clinics in Florida, which has directly attributed to the abuse and the diversion of oxycodone. Chief Boockholdt stated that addicts are coming from around the country to Florida and are specifically seeking oxycodone 15mg and 30mg tablets. Chief Boockholdt stated that in Florida eleven people per day are dying from oxycodone overdoses and seven babies are born each day addicted to opiates. SC Levin discussed the red flags associated with physicians prescribing at pain management clinics and the pharmacies who filled the prescriptions, such as, controlled versus non-controlled drugs, trends in purchasing, types of drugs purchased, quantity of drugs purchased, hours of operation, mainly cash customers, etc. Chief Boockholdt stated that ARCOS data revealed the [REDACTED] was distributing very large quantities of Actavis oxycodone 15mg and 30mg to numerous pharmacies in Florida. Some of the pharmacies had purchased well in excess of a million dosage units per year. This is an obvious concern to DEA and must be addressed by Actavis.

The graphs were broken down by year and included 2010, 2011, and the first six months of 2012. The graphs revealed that Actavis' oxycodone 15mg. and 30mg tablets are distributed throughout the country, but more is distributed in Florida than almost all of the other states combined. The problem is especially bad in South Florida, specifically Miami Dade, Broward and Palm Beach Counties. Chief Boockholdt stated that Florida's prescription drug laws have traditionally been very lax and because of that and the influx of pain management clinics oxycodone sales went out of control. Chief Boockholdt mentioned that because of the amount of oxycodone prescriptions being written, Florida, specifically South Florida has more pending pharmacy applications than all other states combined. Statistics are now showing this problem is spreading north into Georgia, Tennessee, Kentucky, Ohio and West Virginia. SC Levin stated one of the purposes of this meeting is to bring the wholesaler or manufacturer on board to be part of the solution, rather than contribute to the problem.

SC Levin showed graphs of oxycodone shipped by UPS Supply Chain to the distributors and to the distributors' customers. SC Levin advised Ms. Baran that Actavis should send someone from their compliance team to visit pharmacies who were receiving their products in south Florida, in order for them to witness the long lines at pain clinics, out of state license plates, questionable clients, security guard(s) in the parking lots, and signs stating cash payment only. SC Levin and Chief Boockholdt stressed to Ms. Baran and the other Actavis representatives to get to know their customers, visit distribution sites, visit customers of those distributors, check on customers' suspicious order monitoring systems, review due diligence files, and obtain printouts of pharmacies or practitioners who are receiving Actavis products.

Ms. Baran stated Actavis has only recently begun looking at the pharmacies that purchase their products and wants to be involved in working to resolve this problem. SC Levin stated that if their customers refused to provide them with sales information Actavis should consider cutting them off. Chief Boockholdt suggested Actavis determine the percentage of their products being shipped into Florida. SC Levin inquired about the two NDC numbers for both oxycodone 15mg and 30mg tablets in 2011. Ms. Baran stated that two of Actavis NDC numbers was terminated in 2011 and replaced by the two new ones. SC Levin again mentioned the [REDACTED] Ms. Baran stated that [REDACTED] distribution centers purchase oxycodone from Actavis. SC Levin suggested representatives of Actavis travel to some of the distribution sites, especially the one in [REDACTED], to review their suspicious order monitoring systems. A review of [REDACTED] pharmacies purchases of Actavis products is important. The charts shown at this briefing revealed that some [REDACTED]

pharmacies were purchasing in excess of 20 times the national average of oxycodone. SC Levin pointed out that [REDACTED] in Delaware are owned by [REDACTED] and dispense large quantities of oxycodone. Chief Boockholdt mentioned that any manufacturer's quota request is based on anticipated need and the fact that the majority of prescriptions dispensed in Florida were not legitimate show that Actavis' quota may be too high. SC Levin asked the representatives from Actavis to take serious look at their quota request, review their suspicious order monitoring system, visit their customers to review their suspicious order monitoring systems as well as their due diligence files, ask to see their customers' top customers for Actavis products, and contact their local DEA Office with any questions or issues. Ms. Baran stated that their sales force has been informed to keep management abreast of what is going on in the field. SC Levin mentioned that sales people are generally on commission and may not be objective when it comes to their accounts purchasing suspicious or unusual orders of controlled substances.

Ms. Baran said that Actavis will do whatever it takes to remain in compliance with the CSA. Ms. Baran stated she will take this information back to Actavis corporate headquarters and begin thoroughly reviewing charge back information, as well as the other data bases. Ms. Baran stated Actavis Compliance personnel plan to visit more of Actavis' customers to review their due diligence records and suspicious order monitoring systems. Ms. Baran stated Actavis wants to ensure to the best of its ability that their products are being properly monitored by Actavis and their customers.

SC Levin explained that the purpose of this meeting was to inform, educate, provide pertinent ARCOS data, discuss national trends, and discuss the pain management epidemic in Florida involving oxycodone. DEA is seeking to partner with drug distributors and manufacturers in resolving this problem. SC Levin did state that if Actavis or any firm who had been briefed was found to have violated the CSA pertaining to what was discussed during the course of this meeting DEA could seek administrative or civil action to remedy the situation. Chief Boockholdt advised the representatives from Actavis that all employees who have access to controlled substances at Actavis should receive training similar to that provided at this meeting today.

SC Levin asked if there were any questions. There were none. The meeting between the Drug Enforcement Administration and Actavis Elizabeth, LLC was concluded.

Attachments:

1. PowerPoint presentation
2. Graphs of Actavis Elizabeth, LLC ARCOS sales/purchases

cc: GS Andrew Breiner, Newark Division Office

This presentation does not cover the totality of your obligations nor is it a substitute for your obligations as a DEA registrant under The Controlled Substances Act and its Regulations.

September 12, 2012

2

The information presented should not be considered new information. The substance of this presentation has been previously available and communicated through The Controlled Substances Act, its Regulations, Federal Register Notices, DEA and sponsored conferences, correspondence from the DEA, releases from the popular press, in addition to the Registrant's own sales data.

September 12, 2012

3

Closed System

- The comprehensive Drug Abuse Prevention and Control Act of 1970, as amended in 1990 and 1994 created a system for the legitimate manufacturing, distribution, and prescribing/dispensing of controlled substances.
- Each registrant within this “closed system of distribution” has defined privileges and responsibilities in which they must operate.

September 12, 2012

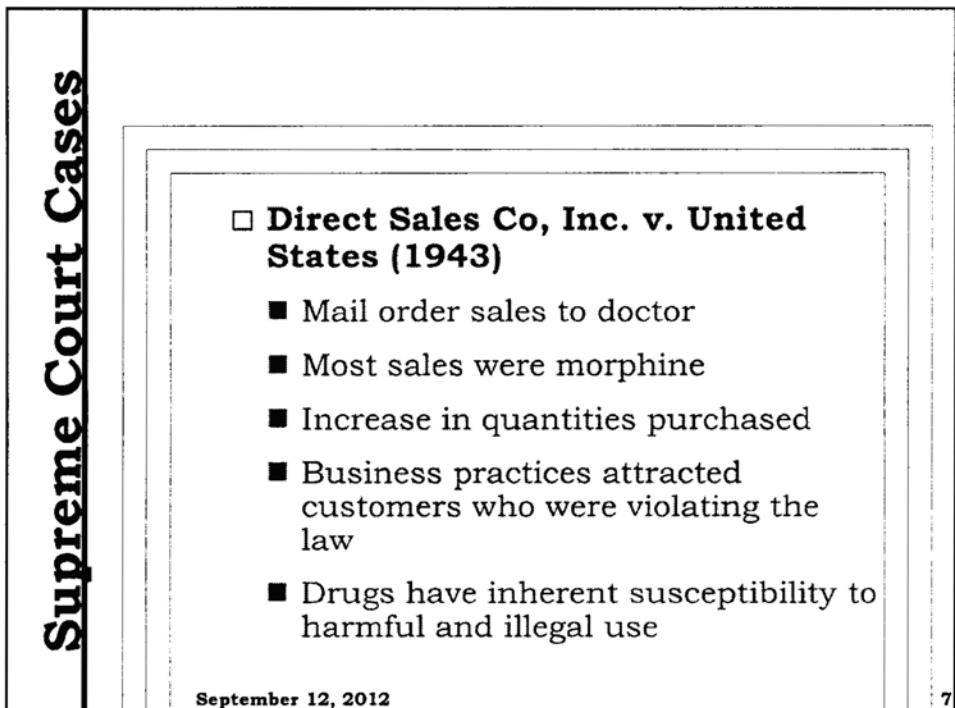
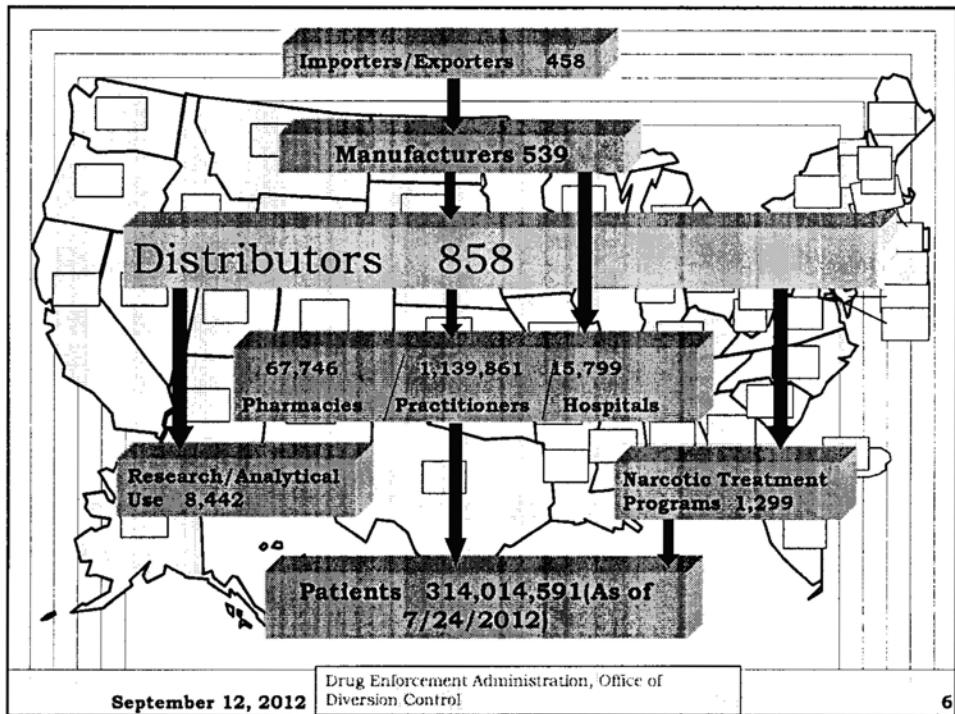
4

Closed System

- When a registrant fails to adhere to their responsibilities, those violations represent a danger to the public and jeopardize the “closed system of distribution”.
- DEA is responsible for the oversight and integrity of the system and to protect the public.

September 12, 2012

5



Supreme Court Cases

United States v. Moore (1975)

- Usual course of professional practice
- Patient with a Medical Complaint
- History
- Physical Examination
- Nexus Between Complaint/History/Exam and Drug Prescribed

September 12, 2012

8

RESPONSIBILITIES

Distributor Responsibilities

- 21 USC, Section 823
- Is the registration in the public interest?

Maintenance of Effective Controls

- Against diversion of particular controlled substances into other than legitimate medical channels

September 12, 2012

9

Responsibilities

Pharmacy Responsibilities:

- 21 USC, 823
 - Compliance with applicable State, Federal, or local laws relating to controlled substances,
 - Such other conduct which may threaten the public health and safety

- 21 CFR, 1306.04(a):
 - A corresponding responsibility rests with the pharmacist who fills the prescription

September 12, 2012

10

Responsibilities

Practitioner Responsibilities:

- 21 USC 823
 - Compliance with applicable State, Federal, or local laws related to controlled substances
 - Such other conduct which may threaten the public health and safety

- 21 CFR 1306.04(a)
 - A prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice

September 12, 2012

11

Ryan Haight Act

- MUST be approved prior to any online dispensing. ONLY a previously registered pharmacy who DEA approved with a modification of registration may be an online pharmacy
- A DEA registered pharmacy that is approved to conduct online dispensing MUST notify DEA and the state boards of pharmacy in all states in which they conduct business 30 days prior to offering a controlled substance to sell, deliver, distribute, or dispense

September 12, 2012

12

Ryan Haight Act

- An online pharmacy MUST comply with all state laws from which and to which they deliver, or dispense, or offer to deliver or dispense controlled substances by means of the Internet
- A VALID prescription for a controlled substance by means of the Internet MUST be for legitimate medical purpose and have at least one in-person medical examination by a practitioner authorized by DEA and respective State authorities to prescribe controlled substances in that controlled substance schedule

September 12, 2012

13

Pain & Other Specialties

- Pain Management Organizations have established guidelines which suggest treatment is not exclusive to the administering of controlled substances only
- There must be a balance between pain and addiction

September 12, 2012

14

Pain & Other Specialties

Recognized Modalities for the Treatment of Pain:

- Pharmacotherapy
- Psychosocial Interventions
- Rehabilitation Techniques
- Complementary & Alternative Medicine
- Implantable Devices & Surgical Interventions

September 12, 2012

15

Pain & Other Specialties

- Three Pain Management Associations recommend “Opioid Guidelines”
- Guidelines provide recommended procedures and best practices for a practitioner to implement
- Not an endorsement by the DEA. A guide for you to assess your customers.

September 12, 2012

16

Suspicious Orders

21 CFR 1301.74

- Requires that registrants design and operate a system to identify suspicious orders
- Report suspicious orders to **DEA when discovered**

September 12, 2012

17

Suspicious Orders

Reporting of a suspicious order to DEA does NOT relieve the distributor of the responsibility to maintain effective controls against diversion

September 12, 2012

18

Suspicious Orders

- DEA cannot advise a distributor if an order is legitimate or not.
- Distributor must determine which orders are suspicious and make their OWN decision to sell or not to sell

September 12, 2012

19

DUE DILIGENCE

“KNOW YOUR CUSTOMER”

Prior to filling an order the distributor should review the following:

- Unusual frequency of order(s),*
- Unusual size of order(s),*
- Deviating substantially from a normal pattern *

* Mandated by 21 CFR, 1301.74(b)

September 12, 2012

20

DUE DILIGENCE

- Range of Products Being Purchased,**
- Methods of Payment (cash, insurance, Medicaid),**
- Location and hours of operation,**
- % Controlled vs. % Non-Controlled,**
- Customer pick up at distributorship**

September 12, 2012

21

DUE DILIGENCE



September 12, 2012

22

Notifications

- Theft and Loss – Report immediately via on-line.
- Contact your local field office.
- ODGR – Regulatory Unit – (202) 307-7161
- ODG@USDOJ.GOV** – Notification of termination of customers for cause. (No explanation required.)

September 12, 2012

23

Actions Taken by DEA

Southwood Pharmaceuticals, Inc.

- 72 FR 36,487 (2007)
 - Revocation of Registration
 - Immediate Suspension Order
 - Failure to maintain effective controls against diversion
 - Supplied millions of dosage units of controlled substances to Internet pharmacies
 - Failure to exercise due diligence (21 USC 823)

September 12, 2012

24

Actions Taken by DEA

Ladapo O. Shyngle, M.D.

- 72 FR 6056 (2009)
 - Revocation of Application to renew registration
 - Dr. Shyngle prescribed C/S's via an Internet questionnaire and telephone interviews.
 - Prescribed over 500,000 d.u. to patients in 41 states.
 - Issued prescriptions primarily for hydrocodone.

September 12, 2012

25

Actions Taken by DEA

Dale L. Taylor, M.D.

72 FR E7-10622 (2007)

- Revocation of registration.
- Authorized prescriptions via the Internet, based solely on on-line questionnaire and telephone conversations.
- Authorized 6,069 prescriptions to 1,098 patients in 46 different states.
- 5,156 prescriptions were for hydrocodone and 526 were for alprazolam.

September 12, 2012

26

Actions Taken by DEA

United Prescription Services

72 FR 50397 (2007)

- Immediate Suspension Order and revocation of registration.
- United Prescription Services operated several Internet sites.
- Between Oct 2005 – Jan 2006, distributed 1,808,693 d.u. More than 1,275,000 were written by one practitioner.
- Mostly written for hydrocodone and alprazolam.

September 12, 2012

27

Actions Taken by DEA

Patrick W. Stodola, M.D.

74 FR 20727 (2009)

- Revocation of Registration.
- Authorized prescriptions based upon an on-line questionnaire and telephone conversations.
- Prescriptions were for hydrocodone.
- Prescriptions were in violation of state laws where the patients were having them filled.

September 12, 2012

28

Actions Taken by DEA

Bob's Pharmacy & Diabetic Supplies

74 FR 19599 (2009)

- Immediate Suspension Order and Revocation of Registration.
- Between Apr – Dec 2007, ordered 2.3 million dosage units of hydrocodone products.
- Prescriptions were approved via an on-line questionnaire.

September 12, 2012

29

SUMMARY

- Prescriptions not written in the usual course of professional practice are not valid.
- Drugs dispensed pursuant to invalid prescriptions are not for legitimate medical purpose, the drugs are being diverted.
- Not limited to Internet pharmacies.

September 12, 2012

30

SUMMARY

- A pattern of drugs being distributed to pharmacies who are diverting controlled substances demonstrates the lack of effective controls against diversion by the distributor
- The DEA registration of the distributor could be revoked under public interest grounds

September 12, 2012

31

SUMMARY

- Any Distributor who is selling controlled substances that are being dispensed outside the course of professional practice must stop immediately
- DEA cannot guarantee that past failure to maintain effective controls against diversion will not result in action against a distributor

September 12, 2012

32

SUMMARY

- DEA will:
 - Meet with other distributors
 - Provide this information to your employees at your request
 - Meet with Industry groups or associations to discuss issue as requested

September 12, 2012

33

SUMMARY

www.deadiversion.usdoj.gov

- Current Revocation Actions
- Policy Changes
- Validation of Registration
- Links to web sites with useful information (AMA, Pain Management, Pharmacy, etc.)
- Other

September 12, 2012

34

NEW DATA REVEAL 400% INCREASE IN SUBSTANCE ABUSE TREATMENT ADMISSIONS FOR PEOPLE ABUSING PRESCRIPTION DRUGS *White House Bulletin*

WASHINGTON - Today, Gil Kerlikowske, Director of National Drug Control Policy (ONDCP), and Thomas M. Perez, Deputy Director of ONDCP, joined Peter Delaney, Director of Substance Abuse and Mental Health Services Administration's (SAMHSA) Office of Applied Studies, and Michele M. Leonhart, Acting Administrator of the Drug Enforcement Administration (DEA), to release a new study showing a 400 percent increase in substance abuse treatment admissions for prescription pain relievers. Governor Jack Markell of Delaware and Chris Kennedy Lawford were also in attendance.

The study, *Substance Abuse Treatment Admissions Involving Abuse of Pain Relievers 1998-2008*, conducted by the SAMHSA, and based on the agency's Treatment Episode Data System (TEDS), reveals a 400 percent increase between 1998 and 2008 of substance abuse treatment admissions for those aged 12 and over reporting abuse of prescription pain relievers. The increase in the percentage of admissions abusing pain relievers spans every age, gender, race, ethnicity, education, employment level, and region. The study also shows a more than tripling of pain reliever abuse among patients who needed treatment for opioid dependence.

"The TEDS data released today highlights how serious a threat to public health we face from the abuse of prescription drugs," said Gil Kerlikowske, National Drug Policy Director. "The spikes in prescription drug abuse rates captured by this study are dramatic, pervasive, and deeply disturbing."

"The non-medical use of prescription pain relievers is now the second-most prevalent form of illicit drug use in the Nation, and its tragic consequences are seen in substance abuse treatment centers and hospital emergency departments throughout our Nation," said SAMHSA Administrator Pamela S. Hyde, J.D. "This public health threat demands that we follow the President's National Drug Control Strategy's call for an all-out effort to raise awareness of this risk and the critical importance of properly using, storing, and disposing of these powerful drugs."

"The data released today is alarming and shows the tremendous damage being caused by prescription drug abuse all across this country each and every day," said DEA Acting Administrator Michele M. Leonhart. "The effective enforcement of laws regulating the distribution of controlled substances, coupled with their lawful disposal are essential parts of a comprehensive strategy to reduce drug abuse. DEA is committed to being part of the solution, however it will take all of us working together to prevent the tragedies that inevitably come with drug abuse."

"This rise in prescription drug abuse is no surprise to the doctors and law enforcement professionals who see its effects in our communities," said Governor Markell. "We have been focused on making sure that health care professionals have the best tools

September 12, 2012

35

available to detect and prevent this kind of abuse before it ruins lives. Delaware's new regulation to authorize a prescription monitoring program is one of those tools and an important component of the President's National Drug Control Strategy."

"Our national prescription drug abuse problem cannot be ignored. I have worked in the treatment field for the last 35 years, and recent trends regarding the extent of prescription drug abuse are startling," said A. Thomas McLellan, Deputy Director of ONDCP. "We must work with prescribers, the pharmaceutical industry, law enforcement, and families to help us fight this scourge."

The National Drug Control Strategy, released in May, outlines several steps to address what Director Kerlikowske calls "the fastest-growing drug problem in the United States"—prescription drug abuse.

They include:

- Increasing prescription drug return, take-back, and disposal programs. Prescription drugs are commonly abused and often found in the family medicine cabinet, and individuals should get rid of unused or expired prescription drugs to prevent diversion and abuse.
- Educating physicians about opiate painkiller prescribing. The Administration's FY 2011 Budget request proposes funding for a program to train prescribers on how to instruct patients in the use and proper disposal of painkillers, to observe signs of dependence, and to use prescription drug monitoring programs to detect when an individual is going from doctor to doctor in search of prescriptions (also called "doctor shopping").
- Expanding prescription drug monitoring programs. Currently, these programs are operating in 34 states. The Administration supports establishment of these programs in every state, and is seeking to ensure new and existing monitoring programs effectively use the data they acquire and share information across state lines.
- Assisting states in addressing doctor shopping and pill mills. Criminal organizations have been trafficking in prescription people to states with little regulation to obtain prescription drugs from multiple doctors or from pill mills, which distribute drugs indiscriminately. Federal, state, local, and tribal authorities are working together to address this problem.
- Driving illegal Internet pharmacies out of business.
- Cracking down on rogue pain clinics that do not follow appropriate prescription practices.

The National Drug Control Strategy provides a blueprint for reducing prescription drug abuse. Parents, law enforcement, the medical community, and all levels of government have a role to play in reducing prescription drug abuse.

September 12, 2012

36

Later today, Director Kerlikowske will travel to Delaware to attend Governor Markell's bill signing for the Delaware Prescription Drug Monitoring Program.

September 12, 2012

37

U.S. can stop some drug sales at 2 CVS stores: judge

Tue, Mar 13, 2012

WASHINGTON (Reuters) - The U.S. Drug Enforcement Administration can suspend CVS Caremark Corp. federal drug sales until a court hearing, a federal judge ruled on Tuesday.

U.S. District Judge Marsha Weller issued a temporary restraining order that took effect as the Drug Enforcement Administration (DEA) and its legal team prepared to argue that CVS Caremark was selling boxes of the painkiller oxycodone outside legitimate channels.

Walton had asked the judge to impose a preliminary injunction that could have blocked the DEA from suspending CVS Caremark's federal drug sales. Further sales were not immediately halted.

CVS Caremark had asked the judge to impose a preliminary injunction that could have blocked the DEA from suspending its federal drug sales. Further sales were not immediately halted.

Walton said he could find no reason to believe the CVS argument that DEA had acted in an "arbitrary and capricious" manner in ordering sales suspended or that restricted samples taken by CVS were sufficient.

"We are fully committed to working with the DEA to do everything we can to reduce prescription drug abuse," the Walton statement said.

The litigation stems from the DEA's battle against prescription drug abuse, which has surged in the United States over the past decade.

The DEA said in court documents that about 7 million Americans abuse pharmaceuticals made with controlled substances for purposes not related to medicine and that Florida is the center of the growing problem.

The federal agency cited state statistics showing a 340 percent increase in overdose deaths related to prescription painkillers, including 11 deaths per day from oxycodone, methadone, hydrocodone, benzodiazepines or fentanyl.

In a case related to the CVS ruling, Walton last month allowed the DEA to suspend Cardinal Health Inc's federal controlled substances from a Florida facility that serves about 2,700 drug stores or hospitals.

The ruling was the latest setback for CVS.

Walton previously ruled that the DEA had acted unreasonably in suspending CVS' federal drug sales.

A CVS attorney said the company had stopped oxycodone sales at the two pharmacies. But a Justice Department attorney said suspensions had involved other controlled substances.

The DEA charged that between January 2010 and December 2011, the two CVS stores purchased oxycodone in amounts nearly 20 times greater than the amounts the DEA had allowed, and addressed the issue only after the DEA acted.

Walton said in court that the volumes were not out of line for legitimate pharmacies that maintain 24-hour service and argued that remedial steps taken by CVS had eliminated any immediate danger to the community by the time the DEA ordered sales suspended in February.

The case is Holliday CVS LLC v. Justice Department, No. 12-cv-191.

(Reporting By David Mihalko; Editing by Gary Hall)

September 12, 2012

38

DEA: Oxycodone orders by pharmacies 20 times average

USA Today.com

Two Florida CVS pharmacies ordered more than 3 million oxycodone pills in 2011, more than 20 times higher than the national average, DEA agents said Monday.

As part of a crackdown on rampant painkiller abuse in Florida, the Drug Enforcement Administration charged a major health care company and the two CVS pharmacies in Sanford, Fla., with violating their licenses to sell the powerful pain pills and other drugs.

"It's an enormous amount, way beyond what would be the legitimate use," said Mark Tocino, the DEA agent in charge of the Miami field division. "We're not talking about a gray area here."

The average pharmacy in the United States ordered about 10,000 oxycodone pills in 2011, the DEA said. The two CVS pharmacies, located less than 8 miles apart, ordered about 3 million.

It is the first time the DEA has suspended the license of a chain pharmacy in Florida to its alleged role in the state's prescription drug abuse problem, Tocino said. The DEA had previously targeted pain clinics known as "pill mills" where rogue doctors prescribe thousands of pain pills with only cursory examinations.

"We're at the end of the line and of this investigation," Tocino said. "We know when we hit the point that these pharmacies would be the next hour. We just didn't know when pharmacies would get into it."

CVS said it took steps with DEA's knowledge to stop filling prescriptions from doctors thought to be prescribing improperly.

"We informed a small number of Florida physicians that CVSPharmacy will no longer fill the prescriptions they write for Schedule II narcotics," spokeswoman Carolyn Costello said in a written statement. Millions of boxes of oxycodone to the two Florida stores have since been filled, but only slightly 60% in the last three months compared to the prior three months — we believe in large part due to our action."

On Friday, the DEA suspended Cardinal Health's controlled substances license at its Lakeland, Fla., distribution center after linking it to high-volume orders of pain pills to four Florida pharmacies, including the two in Sanford. The distribution center services 2,500 pharmacies in Florida, Georgia and South Carolina.

A federal judge temporarily halted the suspension after Cardinal said it would stop supplying the drugs to the four pharmacies. A hearing on the suspension order was set for Feb. 13 in Washington, D.C.

September 12, 2012

39

Cardinal CEO George Barrett called the DEA action a "classic overreaction," and said the company has "extensive procedures" to prevent diversion of its pharmaceuticals for illegitimate use. Cardinal's internal controls have flagged more than 100 pharmacies in Florida and 350 pharmacies nationwide for "suspect or bad patients," he said.

"The needs of pharmacies are varied, and higher volume can be appropriate based on a number of factors, including pharmacy size, hours of operation, patient demographics and proximity to hospital and surgery centers, nursing homes, cancer clinics and hospice providers," Cardinal said in a statement.

September 12, 2012

40

DEA moves against two Florida pharmacies, distributor over pdi sales
CNN.com

(CNN) -- Agents from the Drug Enforcement Administration raided two CVS pharmacies in Florida over the weekend, removing controlled substances and suspending the stores' ability to handle or distribute drugs such as painkillers oxycodone and hydrocodone.

The DEA said that during one year, the two pharmacies -- both in Hartford, Florida -- ordered more than 3 million hydrocodone units from a pharmaceutical wholesaler, which is typical pharmacy orders 60,000.

Agent Mark Trouville was giving press options for an excess of legitimate orders of its customers, said DEA Special Agent in Charge Mark Trouville during a press conference Monday in central Florida.

The DEA also has suspended the controlled substances license of the wholesale distributor, Cardinal Health of Lakeland, Florida, according to Trouville.

"Cardinal Health did not fulfill its due diligence to insure controlled substances were not diverted into other than legitimate channels," Trouville said.

On Friday, Cardinal Health filed and received an emergency injunction from a federal judge in Washington allowing the drug supplier to continue filling orders for other pharmacies.

"We believe the DEA is wrong," said Cardinal Health Chairman and CEO George Barrett in a written statement.

"We strongly disagree with the allegations the DEA has made against our facility and intend to vigorously challenge this action," said Barrett.

The two Stamford pharmacies remain open, filling regular prescriptions but they cannot fill prescriptions for controlled substances such as oxycodone, one form of which is the well-known narcotic OxyContin.

CVS said in a written statement that the company is disappointed by the DEA actions but is fully cooperating with the DEA suspension.

"CVS pharmacies are unwavering in its commitment with and support of the measures taken by federal and state law enforcement agencies to prevent drug abuse and keep controlled substances out of the wrong hands," said CVS spokesman Mike DeAngelis.

Hearings on the suspensions will be held but no date has been set.

Trouville said that since the state of Florida moved to crack down on "pill mills" by banning doctors from directly distributing controlled narcotics, pharmacy sales of controlled substances have skyrocketed.

September 12, 2012

41

DEA agents raid CVS pharmacies

By ANNEKE R. HERNANDEZ
Staff Writer

Federal drug authorities raided two CVS pharmacies in Orlando on Tuesday, searching boxes of medications and other materials from the pharmaceuticals.

"CVS is fully cooperating," said David Rodriguez, a CVS spokesman. "They said the raid was related to action a day earlier by the U.S. attorney's office against Cardinal Health, which has a drug distribution center in Orlando."

The DEA tried to suspend the license of Cardinal Health's distribution center in Orlando, but the company got a reprieve from the U.S. attorney's office, which said the distribution center, not the company, had violated federal laws. A judge then had DEA to order a hold on all controlled substances at Cardinal Health's distribution center in Orlando.

The DEA tried to suspend the license of Cardinal Health's distribution center in Orlando, but the company got a reprieve from the U.S. attorney's office, which said the distribution center, not the company, had violated federal laws. A judge then had DEA to order a hold on all controlled substances at Cardinal Health's distribution center in Orlando.

On Tuesday, DEA agents worked for hours raiding the two Orlando pharmacies, taking boxes of medications from shelves and interviewing employees about their business practices, Rodriguez said.

"We are disappointed that the DEA has taken this action against us," Rodriguez said. "We are fully cooperating with the investigation and are awaiting further information from the DEA."

He said the DEA's action came after an investigation by the U.S. attorney's office, which issued a statement Saturday.

The U.S. attorney's office filed criminal charges against Cardinal Health for its use of powerful pain killers and anti-anxiety drugs.

Cardinal Health said it has cooperated with the investigation and is working to improve its practices at its Florida pharmacies in the process.

"We believe the DEA is correct," said Rodriguez. "We are fully cooperating with the investigation and are working to prevent these mistakes from failing in the wrong hands."

CVS also defended its record, describing its commitment to "keep controlled substances out of the wrong hands."

More than two months ago, the com-

DEA special agent David Hernandez inspects boxes of prescription medications from a CVS store.

pany sent a letter to a small group of pharmacists telling them that they would no longer fill prescriptions for controlled substances and other addictive drugs.

"We understand that this may cause some inconvenience to our customers, we treat them with the utmost care and professionalism," the letter said. "We are sorry for the inconvenience the Orlando location has caused."

On Tuesday, Rodriguez said the letter filed a defamation suit against CVS, saying the letter was "written in a derogatory and unprofessional manner and libelous."

CVS' statement said that while the letter has prompted some inconvenience, the company is having a positive impact.

"We are seeing a 20 percent increase in prescriptions for controlled substances and prescriptions dropped from 600 million in 2009 to 400 million in 2011," Rodriguez said.

CVS emphasized its role in that effort, noting that 95 percent of prescriptions written nationally Saturday have been filled by pharmacists, while 90 percent of the last three months' prescriptions in the three states where CVS operates are believed in large part due to pharmacists.

anneke.hernandez@orlandosentinel.com or 407-429-2439

September 12, 2012

September 12, 2012

42

2A MONDAY, FEBRUARY 6, 2012 USA TODAY

DEA charges 2 Fla. pharmacies in pill mill probe

Drug wholesaler also under investigation

By Daniel Lippman and Leslie E. Broomer
USA TODAY

Federal authorities have expanded their investigation into a Florida drug wholesaler, two chain companies and two CVS pharmacies in Florida with evidence that someone is well positioned to peddle prescription drugs.

The Drug Enforcement Administration issued Court documents to a U.S. magistrate judge in the conservative district in four of the 10 states of the investigation to ban high shipments of the controlled drugs in four of the 10 states of the investigation to ban high shipments of

On Friday, the DEA suspended Cardinal's contract to supply controlled substances to its main distribution center, which services 2,000 pharmacies in Florida, Georgia and South Carolina.

A federal judge temporarily halted the suspen-

sion the same day after Cardinal, a \$1.3 billion company based in St. Louis, argued that suspending its right to supply controlled substances to the four pharmacies, a New York-based medical device company and a Florida CVS store was not necessary for Feb. 13 in Washington, D.C.

The suspension was issued by U.S. Magistrate Judge William C. Gandy Jr. of the U.S. District Court for the Northern District of Florida.

The article states that the DEA is cracking down on what it calls "pill mills" — prescription drug clinics that divert the highly addictive pills, such as oxycodone, to drug addicts.

"This is not to say that prescription drugs are not being misused," said DEA Special Agent David Mellenbeck, spokesman for the Miami office. "But we are focusing on the providers, not the patients." — USA TODAY

On Saturday, the DEA mailed three CVS pharmacies in Florida, Georgia and South Carolina to suspend controlled substances.

On Sunday, the DEA issued a temporary injunction to a Florida CVS store to stop filling prescriptions with controlled substances. The injunction was issued to prevent the diversion of controlled substances.

"We informed a small number of CVS do phy-

lips that they could no longer fill the prescriptions that contained controlled substances," said Michael C. Clegg, spokesman for the DEA's Miami office. "It is the first time we have done this."

On Monday, the DEA issued a temporary injunction to a Florida CVS store to stop filling prescriptions with controlled substances.

"We informed a small number of CVS do phy-

lips that they could no longer fill the prescriptions that contained controlled substances," said Michael C. Clegg, spokesman for the DEA's Miami office.

On Monday, the DEA issued a temporary injunction to a Florida CVS store to stop filling prescriptions with controlled substances.

"We informed a small number of CVS do phy-

lips that they could no longer fill the prescriptions that contained controlled substances," said Michael C. Clegg, spokesman for the DEA's Miami office.

"We informed a small number of CVS do phy-

lips that they could no longer fill the prescriptions that contained controlled substances," said Michael C. Clegg, spokesman for the DEA's Miami office.

"We informed a small number of CVS do phy-

September 12, 2012

43

Cardinal Health settles drug distribution case
USA Today
 May 16, 2012

The DEA suspended Cardinal Health, the country's second largest drug distributor, from selling or shipping powerful painkillers and other drugs from its Lakeland, Fla., facility for two years.

The Drug Enforcement Administration sought to revoke Cardinal's license in February, accusing the company of selling excessive amounts, more than 1.2 million hydrocodone pain pills, to four Florida pharmacies over three years. The DEA said the company did not report suspicious orders or visit the chain pharmacies that purchased large amounts of the drugs.

The DEA also suspended controlled substances licenses for two CVS pharmacies in Standord, Fla., which purchased millions of oxycodone pills from Cardinal. A judge is expected to rule on the CVS case this month.

"Cardinal Health is not above the law," said Joe Rauhmeier, DEA deputy assistant administrator. "With this agreement, it admits that it neglected its vital responsibility to prevent the diversion of controlled substance medications."

While the agreement resolves the pending issue, the DEA said it may pursue civil penalties, including fines, against the company. The Dublin, Ohio-based company had revenue of more than \$100 billion in 2011.

This is the second time the DEA has taken action against Cardinal. In 2008, Cardinal paid a \$34 million fine after the DEA accused it of shipping excessive amounts of hydrocodone, another powerful painkiller, to Internet pharmacies. As part of that settlement, the DEA suspended licenses at three distribution facilities for a year.

Cardinal admitted Tuesday it had "inadequate" control over some of its controlled drugs and had not fully complied with the 2008 agreement.

"This agreement allows us to put this matter behind us, and just as important, will clear the way for a more productive dialogue about how we and others in the health care and regulatory community can work together to prevent the abuse and misuse of prescription drugs," Cardinal CEO George Barrett said.

The five-year agreement applies to all 28 of Cardinal's distribution facilities and requires the company to review orders for the controlled drugs, visit pharmacies to look for signs of diversion and hire extra field inspectors for Florida pharmacies.

The Lakeland facility can still distribute non-controlled drugs and medical supplies.

September 12, 2012

44

Cardinal Plant Can't Ship Pain Pills
Wall Street Journal

A U.S. appeals court recently issued a stay of the DEA's enforcement orders against Cardinal's Lakeland, Fla., facility, the court ruling that the agency's battle of wits with the administration moved to suspend that facility's license.

While the appeals court recently issued a stay of the DEA's enforcement orders against Cardinal's Lakeland, Fla., facility, the court ruled that the agency's battle of wits with the administration moved to suspend that facility's license.

Cardinal, based in Dublin, Ohio, had it activated contingency plans earlier this month "and will continue to do so until our customers' needs with material disruption from our other distribution centers."

The contingency plans are for shipping controlled drugs to customers in the Southeast U.S. from alternative facilities in Mississippi or North Carolina. Analysts have said that plans could add transportation costs to Cardinal and delay deliveries.

The suspension of the DEA license means the Lakeland facility is blocked from shipping controlled medications like the pain drug oxycodone to thousands of pharmacies nationwide and other controlled products. Cardinal is a No. 2 drug distributor by sales after McKesson Corp., which also ships controlled medications, which include most prescription drugs, and supplies such as surgical packs.

The DEA also suspended last month the controlled-substance license of four Florida pharmacies, including two owned and operated by CVS Caremark Corp. CVS and a family of pharmaceutical sites on Wednesday to keep dispensing controlled medications after it appeared a court denied the pharmacy chain's request for a preliminary injunction.

The DEA took action against the Lakeland facility last month while accusing Cardinal of not doing enough to stop oxycodone abuse. Cardinal has said that it supports the DEA's efforts but also disagreed that it wasn't doing enough.

A U.S. District Court judge ruled in late February that the government acted properly in trying to cut off shipments of oxycodone from the Lakeland site. Cardinal appealed that ruling to the U.S. Court of Appeals for the District of Columbia Circuit.

September 12, 2012

45

Page 1 of 2

DEA searches Fla. Walgreens in painkiller probe

CURT ANDERSON, AP Legal Affairs Writer
Updated 3:01 p.m., Friday, April 6, 2012

MIAMI (AP) — Federal drug agents have searched six Walgreens pharmacies and a company distribution center in Florida as part of an investigation into prescription painkiller drug abuse, U.S. Drug Enforcement Administration officials said Friday.

The distribution center in Jupiter and the six pharmacies — two in Fort Pierce and one each in Hudson, Port Richey, Port Myers and Oviedo — all showed signs of suspiciously high distribution of the highly addictive drug oxycodone, a DEA investigator wrote in an affidavit for the search warrants.

Such large amounts, investigator Marjorie Milan wrote, indicates "a pharmacy that fills prescriptions issued by physicians at pain clinics and/or a pharmacy which services primarily drug-seeking individuals who abuse the medication."

The searches for pharmacy records conducted Wednesday are the latest in a crackdown by federal and state authorities on "pill mills" and other illegal sources of prescription drugs in Florida, which has become the nation's leading source of oxycodone and similar drugs. The DEA says that prescription drug abuse now exceeds abuse of all illegal drugs combined, except marijuana.

Michael Polzin, a spokesman for Deerfield, Ill.-based Walgreens, said it is cooperating in the investigation.

8/14/2012

September 12, 2012

46

Page 2 of 2

Earlier this year, the DEA moved to suspend the sale of similar controlled substances at two CVS pharmacies in the Orlando area, and the shipment of them from Cardinal Health Inc.'s Lakeland, Fla.-based center that supplied the stores. A federal appeals court recently upheld those suspensions.

DEA records cited in the Walgreens affidavit show sharp increases in oxycodone purchases at each of the locations. For example, the pharmacy in Fort Myers went from selling 95,800 units of oxycodone in 2009 to more than 2.1 million units in 2011 — good for 67 percent of all the oxycodone purchased by pharmacies in that same zip code in 2011.

In the first two months of this year, the DEA added, 53 Walgreens pharmacies are listed in the agency's top 100 purchasers of oxycodone. In 2009, none were on the list.

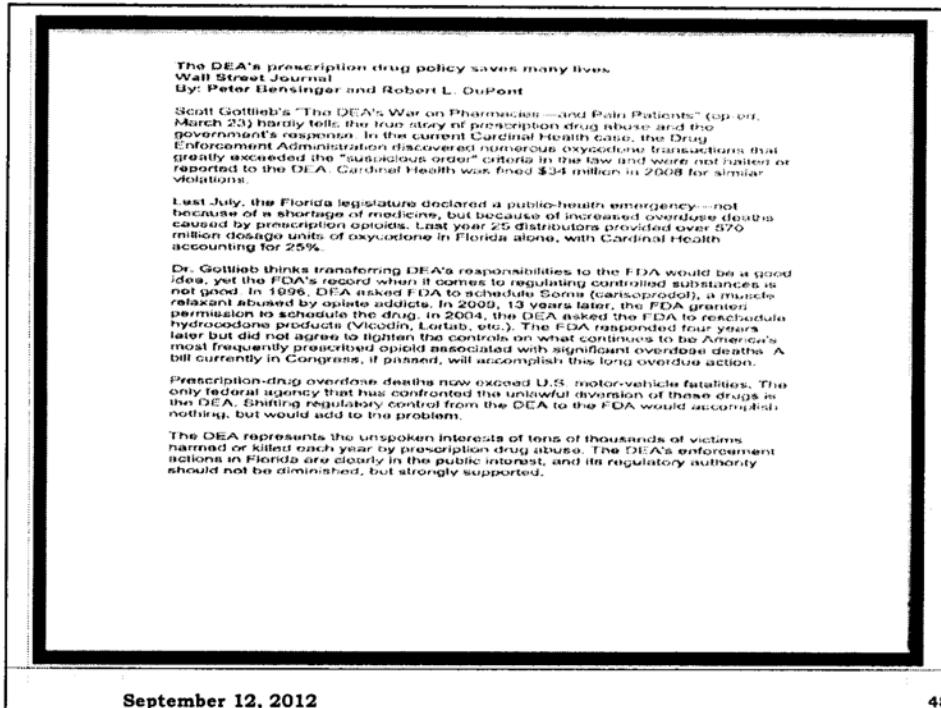
Earlier this year, the DEA released figures showing that Florida may be losing its distinction as the nation's leading illicit source for painkillers because of the ongoing law enforcement crackdown and several new laws. Florida also last year began operating a prescription drug tracking system and database aimed at combating illegal diversion of the drugs.

About 85 people, including at least 15 doctors, have been arrested in South Florida over the past year on pill mill-related charges, according to federal prosecutors.

8/14/2012

September 12, 2012

47



48

Top 60 Pharmacies Sales of Oxycodone 15mg (NDC 52152-0214-02)							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF1006328	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	246,000
2	AB124437	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	213,600
3	FH001247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19873	194,600
4	BE165188	HEPBURN	BEDFORD	AMANDA	FL	35110	177,300
5	BE611254	EXPRESS SCRIPTS	BUCKS	BENSALEM	PA	30020	168,300
6	BT148546	THE WELLNESS PHARMACY INC	DAVIDSON	ANTIOCH	TN	37615	160,000
7	BJ187446	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33203	148,000
8	FJ100649	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	146,900
9	BS124349	SAFESCRIPT PHARMACY #6	CABELL	HUNTINGTON	WV	25701	145,400
10	AW0028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32906	138,000
11	FH161617	HAPPY HARRY'S INC.	SUSSEX	MILFORD	DE	19963	134,100
12	BW8872484	WALGREEN CO.	SAIN LUCIE	FORT PIERCE	FL	34981	127,900
13	FG617183	SANDLAKE PHARMACY	ORANGE	ORLANDO	FL	32819	126,600
14	BE1613162	ESI MAIL PHARMACY SERVICE	MARICOPA	TEMPE	AZ	85284	125,600
15	BW1649760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	125,500
16	AW1366977	WALGREEN CO.	LEE	FORT MYERS	FL	33807	124,100
17	BP1774732	PROSPECTIVE PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	117,400
18	BE161414	NOVA PHARMACY	WESTMORELAND	IRVING	PA	16442	110,700
19	BO1931567	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	107,700
20	BH875026	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19761	103,400
21	AW8430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	101,100
22	BW16133916	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	98,500
23	BW6033904	WALGREEN EASTERN CO., INC.	STRAFFORD	ROCHESTER	NH	03867	98,000
24	FW2277283	WALGREEN CO.	CALVERT	PRINCE FREDERICK	MD	20678	98,300
25	FP1067164	PERRY DRUG INC.	JOHNSON	LENEWA	KS	66216	97,600
26	BW8810779	WALGREENS MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819	96,500
27	FU170012	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605	94,700
28	BW8837581	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	63222	94,600
29	BH874510	HAPPY HARRY'S INC.	SUSSEX	LEWES	DE	19958	93,600
30	BW1620413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234	91,600
31	AW802041	WALGREEN CO.	MANATEE	BRADENTON	FL	34206	90,600
32	AW1613164	BLK VISION INC	SUSSEX	ELKHORN	NC	28111	89,300
33	BL1239416	LOVELACE OUTLET PHARMACY	BERNALILLO	ALBUQUERQUE	NM	87108	88,700
34	BH874161	HAPPY HARRY'S INC.	NEW CASTLE	NEWARK	DE	19713	88,700
35	AM8423880	MANOR PHARMACY	NEW CASTLE	NEW CASTLE	DE	19720	87,400
36	AW6020529	WALGREEN CO.	MANATEE	BRADENTON	FL	34207	86,300
37	BH875216	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19966	88,000
38	DE624217	EXPRESS SCRIPTS	SAIN LUCIE	SAIN LOUIS	MO	63134	88,700
39	BW6713982	WALGREEN CO.	PASCO	HUDSON	FL	34467	84,300
40	BP1244236	PHARMCORE INC	BROWARD	HALLANDALE	FL	33009	82,400
41	A7111246	TRU-VALU DRUGS	PALM BEACH	LAKE WORTH	FL	33460	82,600
42	FW9988467	WALGREEN CO.	ORANGE	WINTER PARK	FL	32789	82,200
43	BW8661270	WALGREEN CO.	SAIN LUCIE	PORTE ST LUCIE	FL	34862	82,000
44	BP1244232	WALGREEN CO.	ASHTABULA	ASHTABULA	OH	44004	81,700
45	AG139823	P & S PHARMACY	SULLIVAN	KINGSPORT	TN	37640	81,600
46	PW1422812	WALGREEN CO.	MATANUSKA SUBRINA	WASILLA	AK	99544	81,400
47	BH874923	HAPPY HARRY'S INC.	SUSSEX	MILLSBORO	DE	19964	81,200
48	BW8819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLendale	AZ	85308	80,400
49	BW7169154	WALGREEN CO.	SALT LAKE	SALT LAKE CITY	UT	84118	79,400

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC 62162-0216-02) 2019							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF700626	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	1,340,800
2	BJ375446	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	1,078,100
3	BG377750	GENERIC-DEPOT #2 INC	BROWARD	HOLLYWOOD	FL	33026	970,400
4	FG1544239	GENERIC DEPOT 3, INC	BROWARD	FORT LAUDERDALE	FL	33321	792,400
5	FH0772267	HILLS PHARMACY	HILLSBOROUGH	TAMPA	FL	33616	663,400
6	BJ9762116	JR PHARMACY	ORANGE	ORLANDO	FL	32837	618,600
7	AW8830267	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	599,700
8	BW542786	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	543,500
9	BW4713982	WALGREEN CO.	PASCO	HUDSON	FL	34667	542,300
10	BW072494	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	517,700
11	BO931657	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	482,000
12	BW1133916	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	470,600
13	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	447,200
14	BK7856082	KABS OF TAMPA	HILLSBOROUGH	TAMPA	FL	33813	405,400
15	BS8265274	SUPERIOR PHARMACY LLC	HILLSBOROUGH	TAMPA	FL	33609	379,300
16	BB5351168	BELEW DRUG	KNOX	KNOXVILLE	TN	37917	342,900
17	FN1212398	NDP LLC	BROWARD	POMPANO BEACH	FL	33064	339,200
18	AW2068897	WALGREEN CO.	PINELLAS	LARGO	FL	33771	332,700
19	FK1428196	KISKEYA PHARMACY	BROWARD	FORT LAUDERDALE	FL	33312	349,200
20	BH9314343	HYGEIA HOLDINGS, LLC	PINELLAS	LARGO	FL	33771	336,700
21	BW7066647	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428	332,800
22	BP6777632	PROSCRIPT PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	322,800
23	AW6430683	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	319,200
24	BS989751	SUPERIOR PHARMACY, LLC	HILLSBOROUGH	TAMPA	FL	33616	318,100
25	BR0378730	RUPAL ENTERPRISE INC	SUFFOLK	SELDEN	NY	11784	315,800
26	FJ1677743	JPPD INC	PALM BEACH	BOCA RATON	FL	33431	314,300
27	AS8841428	SCHAEFER DRUGS WELLINGTON	PALM BEACH	WELLINGTON	FL	33414	313,800
28	FF0129709	FUTURE PHARMACY LLC	MIDDLESEX	OLD BRIDGE	NJ	08857	313,800
29	BL3161178	L KRENK	MAUI	KAHULUI	HI	96732	312,600
30	BS9444947	BETTER HEALTH PHARMACY INC	HILLSBOROUGH	SEFFNER	FL	33594	310,300
31	BS9481147	SUPER SAVER PHARMACY	OSCEOLA	KISSIMMEE	FL	34744	300,400
32	BW0822947	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	298,800
33	AW1368977	WALGREEN CO.	LEE	FORT MYERS	FL	33807	295,100
34	AW6200989	WALGREEN CO.	BROWARD	HOLLYWOOD	FL	33024	294,100
35	BW6561278	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	281,000
36	FP1223889	PROGRESSIVE PHARMACY INC.	PALM BEACH	LAKE WORTH	FL	33467	287,400
37	AH2731035	HOLLYWOOD DISCOUNT PHARMACY	BROWARD	HOLLYWOOD	FL	33021	286,300
38	BW7288752	WALGREEN CO.	ORANGE	OCCOEE	FL	34781	282,400
39	AW9523994	WALGREEN CO.	BREVARD	PALM BAY	FL	32909	277,700
40	BS9838424	SARASOTA PHARMACY SERVICES	SARASOTA	SARASOTA	FL	34233	277,300
41	FE1612601	EDGE PHARMACY	POLK	LAKELAND	FL	33803	272,900
42	AM1444449	WALGREEN CO.	ORANGE	ORLANDO	FL	33000	266,600

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 62162-0214-02) 2019							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	AW1368877	WALGREEN CO.	LEE	FORT MYERS	FL	33807	411,100
2	FH0653247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	148,000
3	BE8824917	EXPRESS SCRIPTS	SAINT LOUIS	SAINT LOUIS	MO	63134	131,800
4	BW9474538	WALGREEN CO.	SEMINOLE	OVIEDO	FL	32765	128,300
5	BW4713982	WALGREEN CO.	PASCO	HUDSON	FL	34667	127,800
6	THE MEDICINE SHOPPE	ALLEGHENY	OAKMONT	PA	15139	122,000	
7	BW0377283	WALGREEN CO.	CALVERT	PRINCE FREDERICK	MD	20678	121,400
8	BT9377986	THE PILL BOX PHARMACY	SUSSEX	MILFORD	DE	19963	110,400
9	BW8872484	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34811	109,800
10	BC7126467	CAREDIM HEALTH CORPORATION	LEE	BONITA SPRINGS	FL	34335	109,300
11	FH1616167	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19983	108,200
12	BW9344726	NORWICH PHARMACY	WESTMORELAND	IRVINE	PA	66442	104,200
13	FP1855446	PHARMA-1	FRANKLIN	COLUMBUS	OH	42207	104,400
14	AB9244947	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99509	104,600
15	FV178879	VILLAGE PHARMACY	LIVINGSTON	DENHAM SPRINGS	LA	70726	101,200
16	BW1644876	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730	99,000
17	AW3026304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905	98,900
18	DE9731026	ESTRELLA PHARMACY	MARICOPA	PHOENIX	AZ	85037	96,400
19	AT3701172	CITY PHARMACY INC OF ELKTON	ATCIL	ELKTON	MD	21921	94,500
20	BW6561270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34962	93,200
21	AW8830247	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	92,300
22	AN1654337	NATIONAL FAMILY PHARMACY	SEBASTIAN	FORT SMITH	AR	72301	86,700
23	FV1144674	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	84,300
24	BW6567416	WALGREEN CO.	SUSSEX	OVIEDO	FL	32765	83,900
25	FU1700612	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605	83,800
26	FV1444895	WALGREEN CO.	ORANGE	ORLANDO	FL	32807	81,300
27	BS8246349	SAFSCRIPT PHARMACY #6	CABELL	HUNTINGTON	WV	25701	81,600
28	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLendale	AZ	85308	79,900
29	BF7003262	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	79,200
30	BH9875028	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19701	79,100
31	BW8837691	WALGREEN CO.	MILWAUKEE	WILMINGTON	DE	53222	78,300
32	FJ1306489	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	77,800
33	FH9898816	HAPPY HARRY'S INC.	KENT	DOVER	DE	19904	77,500
34	FV1223859	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	76,300
35	AM0020253	WALGREEN CO.	MANATEE	BRADENTON	FL	34207	76,500
36	FP178879	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37832	74,400
37	DE9873116	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19966	74,500
38	FV0488073	WALGREEN CO.	CLARK	WINCHESTER	KY	40391	74,200
39	BW751880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33449	73,800
40	BW7754769	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33709	73,600
41	AW8641234	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33712	73,800
42	FV1422512	WALGREEN CO.	MATANUSKA SUSTINA	WASILLA	AK	89654	73,500
43	BW1133916	WALGREEN CO.	ORANGE	ORLANDO	FL	32906	73,800
44	AM6423080	MANOR PHARMACY	NEW CASTLE	DE	19720	65,300	
45	BW8997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	65,000
46	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19547	64,700
47	AW1703463	WALGREEN CO.	MARTIN	STUART	FL	34937	64,700

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC00228-2879-1) 2011						
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip
1	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919
2	BW5467432	WALGREEN CO.	SEMINOLE	OVIEDO	FL	32765
3	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667
4	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907
5	BW5872494	WALGREEN CO.	SAINT LUCIE	FORT FIERCE	FL	34981
6	BW6561270	WALGREEN CO.	SAINT LUCIE	FORT SAINT LUCIE	FL	34952
7	FR1435355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	BOCALUSA	LA	70427
8	BW1249160	WALGREEN CO.	SAINT LUCIE	FORT SAINT LUCIE	FL	34952
9	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932
10	AN1556337	NATIONAL FAMILY PHARMACY	SEBASTIAN	FORT SMITH	AR	72901
11	BW1548760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730
12	AW1307136	WALGREEN CO.	CITRUS	HOMOSASSA	FL	34446
13	BW9688992	WALGREEN CO.	MARION	OCALA	FL	34482
14	BW9628631	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33702
15	FD0598207	DUANE READE	NEW YORK	NEW YORK	NY	10003
16	BW1239118	WALGREEN CO.	DUVAL	JACKSONVILLE	FL	32216
17	BW7649308	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919
18	FW0487122	WALGREEN CO.	CITRUS	HOMOSASSA	FL	34446
19	AW1768463	WALGREEN CO.	MARTIN	STUART	FL	34997
20	BW8940923	WALGREEN CO.	PINELLAS	LARGO	FL	33771
21	AW3028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905
22	BW0882957	WALGREEN CO.	ORANGE	ORLANDO	FL	32812
23	AK3221140	KEANSBURG DRUGS	MONMOUTH	KEANSBURG	NJ	07734
24	BW6383169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917
25	AW201032	WALGREEN CO.	PALM BEACH	WEST PALM BEACH	FL	33404
26	BW7056424	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428
27	AW2388248	WALGREEN CO.	SAINT LUCIE	FORT FIERCE	FL	34950
28	FW0064799	WALGREEN CO.	PALM BEACH	WELLINGTON	FL	33414
29	FH0828513	HUMANA PHARMACY INC DBA RIGHTSOURCE	BUTLER	WEST CHESTER	OH	45069
30	AW2390699	WALGREEN CO.	BARASOTA	BARASOTA	FL	34233
31	BJ3678456	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309
32	FW1444695	WALGREEN CO.	ORANGE	ORLANDO	FL	32807
33	AW6043234	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33712
34	BW4808929	WALGREEN CO.	INDIAN RIVER	VERO BEACH	FL	32962
35	BW5507418	WALGREEN CO.	SEMINOLE	OVIEDO	FL	32765
36	BW5106178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816
37	BH4285309	HEALTHWISE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614
38	BE9503687	E. HARTMAN LLC DBA DEAL DRUGS	DAVIDSON	NASHVILLE	TN	37211
39	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816
40	AW6041153	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33703
41	BW7758759	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33709
42	FH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973
43	BW0523488	WALGREEN CO.	PASCO	NEW PORT RICHEY	FL	34653
44	BW4933114	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33707
45	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948
46	BA4348505	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128
Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 00228-2878-11)						
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip
1	BW5837561	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222
2	A89244497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508
3	FB2049446	BYPAS PHARMACY, INC.	RALEIGH	BECKLEY	WV	25801
4	FH1151517	HAPPY HARRY'S, INC.	BUSSEX	MILFORD	DE	19963
5	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919
6	BTO167444	THE MEDICINE SHOPPE	ALLEGHENY	DAKMONT	PA	15139
7	FH1454999	HOWARD FAMILY PHARMACY, INC.	FLOYD	EASTERN	KY	41622
8	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	24667
9	BF4478802	FRANCIS ERS.	ALLEGHENY	PITTSBURGH	PA	15202
10	FA2348616	ARIZONA PHARMACY # 2	MARICOPA	PHOENIX	AZ	85027
11	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233
12	BW5093888	WALGREEN EASTERN CO., INC.	PROVIDENCE	WOONSOCKET	RI	02885
13	BC8361343	CRAN TOWERS PHARMACY	ANNE ARUNDEL	GLEE BURNIE	MD	21061
14	BW4080996	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208
15	FW1444574	WALGREEN CO.	RALPH	BECKLEY	WV	25801
16	BW7220413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234
17	FU1000512	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605
18	FH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973
19	BW69977906	WALGREEN CO.	PUEBLO	PUESLO	CO	81001
20	FW1223659	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801
21	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932
22	BH7185385	NORTHSIDE PHARMACY LLC	LAFAYETTE	LAFAYETTE	LA	70501
23	FW1422512	WALGREEN CO.	MATANUSKA SUSITNA	WASILLA	AK	99554
24	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19947
25	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308
26	BW9910879	WALGREEN'S MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819
27	B77485166	THE WELLNESS PHARMACY INC.	DAVIDSON	ANTIOCH	TN	37013
28	FJ13056499	JR SERVICES OF SARASOTA LLC	MARATEE	BRADENTON	FL	34202
29	BW6578734	WALGREEN CO.	BALTIMORE CITY	BALTIMORE	MD	21224
30	BW1010880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948
31	FW1704825	MEDABOR PHARMACY	MONTGOMERY	BALA CYWYD	PA	19004
32	BW7143908	WALGREEN CO.	MILLSBOROUGH	TAMPA	FL	33603
33	BX9628560	XPRESS CARE PHARMACY	MARICOPA	AVONDALE	AZ	85392
34	BL9260415	LAKE PHARMACY	LAKE	CLEARLAKE	CA	95422
35	BW404358	WALGREEN EASTERN CO., INC.	BUCKS	LEVITTOWN	PA	19054
36	BW3087392	WALGREEN HASTINGS CO.	BANDOVAL	RIO RANCHO	NM	87124
37	FB2332780	RT 70 PHARMACY, INC.	CAMDEN	CHERRY HILL	NJ	08034
38	BW6087770	WALGREEN CO.	PUEBLO	PUEBLO	CO	81008
39	BW519498	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 00228-2878-11)						
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip
1	BW5837561	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222
2	A89244497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508
3	FB2049446	BYPAS PHARMACY, INC.	RALEIGH	BECKLEY	WV	25801
4	FH1151517	HAPPY HARRY'S, INC.	BUSSEX	MILFORD	DE	19963
5	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919
6	BTO167444	THE MEDICINE SHOPPE	ALLEGHENY	DAKMONT	PA	15139
7	FH1454999	HOWARD FAMILY PHARMACY, INC.	FLOYD	EASTERN	KY	41622
8	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	24667
9	BF4478802	FRANCIS ERS.	ALLEGHENY	PITTSBURGH	PA	15202
10	FA2348616	ARIZONA PHARMACY # 2	MARICOPA	PHOENIX	AZ	85027
11	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233
12	BW5093888	WALGREEN EASTERN CO., INC.	PROVIDENCE	WOONSOCKET	RI	02885
13	BC8361343	CRAN TOWERS PHARMACY	ANNE ARUNDEL	GLEE BURNIE	MD	21061
14	BW4080996	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208
15	FW1444574	WALGREEN CO.	RALPH	BECKLEY	WV	25801
16	BW7220413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234
17	FU1000512	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605
18	FH0853247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973
19	BW69977906	WALGREEN CO.	PUEBLO	PUESLO	CO	81001
20	FW1223659	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801
21	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932
22	BH7185385	NORTHSIDE PHARMACY LLC	LAFAYETTE	LAFAYETTE	LA	70501
23	FW1422512	WALGREEN CO.	MATANUSKA SUSITNA	WASILLA	AK	99554
24	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19947
25	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308
26	BW9910879	WALGREEN'S MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819
27	B77485166	THE WELLNESS PHARMACY INC.	DAVIDSON	ANTIOCH	TN	37013
28	FJ13056499	JR SERVICES OF SARASOTA LLC	MARATEE	BRADENTON	FL	34202
29	BW6578734	WALGREEN CO.	BALTIMORE CITY	BALTIMORE	MD	21224
30	BW1010880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948
31	FW1704825	MEDABOR PHARMACY	MONTGOMERY	BALA CYWYD	PA	19004
32	BW7143908	WALGREEN CO.	MILLSBOROUGH	TAMPA	FL	33603
33	BX9628560	XPRESS CARE PHARMACY	MARICOPA	AVONDALE	AZ	85392
34	BL9260415	LAKE PHARMACY	LAKE	CLEARLAKE	CA	95422
35	BW404358	WALGREEN EASTERN CO., INC.	BUCKS	LEVITTOWN	PA	19054
36	BW3087392	WALGREEN HASTINGS CO.	BANDOVAL	RIO RANCHO	NM	87124
37	FB2332780	RT 70 PHARMACY, INC.	CAMDEN	CHERRY HILL	NJ	08034
38	BW6087770	WALGREEN CO.	PUEBLO	PUEBLO	CO	81008
39	BW519498	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 52152-0214-02) January 1, 2012 to June 30, 2012					
Rank	Buyer's DEA Number	Buyer's Name	Buyer's State	Total	
1	FQ1872844	QUICK CARE PHARMACY INC	CA	3,600	
2	AA8612790	CIGNA HEALTH PLAN OF ARIZONA	AZ	2,400	
3	BF3545704	FRUTH PHARMACY #16	OH	2,400	
4	FD0982846	DELCO DRUGS & SPECIALTY PHARMACY INC.	NY	1,000	
5	BB9732389	BASHAS UNITED DRUG #160	AZ	1,000	
6	BF1124609	FRUTH PHARMACY OF HURRICANE	WV	900	
7	FM0386082	MORRILTON FOOD & DRUG BIG STAR	AR	600	
8	FT0748333	TOTAL PHARMACY AND COMPOUNDING SERVICES	TX	500	
9	AK5643095	KLINGENSMITH'S DRUG STORE	PA	500	
10	BR3876084	REEDSBURG MEDIC ARTS PHAR	WI	300	
11	AW4125452	BUFFALO DRUGS INC	MI	200	
12	BE8487589	EDMONDSON DRUG CO INC	AL	100	
13	FT0710649	TAINO STAR PHARMACY INC	NY	100	

September 12, 2012

54

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC 52152-0215-02) January 1, 2012 to June 30, 2012							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BO9283184	OLD TOWN PHARMACY INC	RICHMOND	STATER ISLAND	NY	10305	26,000
2	BM4633269	MW & W GLOBAL ENTERPRISES INC	KING	BROOKLYN	NY	11222	17,600
3	BB4896784	BARRINGTON-WILSHIRE PHARMACY	LOS ANGELES	LOS ANGELES	CA	90025	12,000
4	FB2339918	BAV MART PHARMACY II	WAYNE	DETROIT	MI	48207	9,700
5	AR5920079	ROSSMORE PHARMACY INC	ESSEX	BELLEVILLE	NJ	07109	8,300
6	BB9114000	SAINT MARY AND JESSIE, LLC	MIDDLESEX	PERTH AMBOY	NJ	08861	7,900
7	AP8437199	PARAMOUNT DRUG	BURLINGTON	RIVERSIDE	NJ	08075	7,200
8	BM9698851	MEDMARSH PHARMACY	FAYETTE	CONNELLSVILLE	PA	15425	7,200
9	BO4568715	BRIDGE & PRATT FAMILY PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	19124	6,100
10	AM9597800	MOUNDRIDGE PHARMACY	MARRHALL	MOUNDRIDGE	WV	26041	5,600
11	FS1638266	SCRIPT LIFE PHARMACY	FRESNO	CLOVIS	CA	93612	5,400
12	BD0100317	DEAL ENTERPRISE	VENTURA	EDMI VALLEY	CA	93045	4,800
13	BM0180086	MEDICINE SHOPPE	FRESNO	FRESNO	CA	93272	4,600
14	BR6655712	RIVERSIDE PHARMACY	ETOWAH	GADESDEN	AL	38901	4,100
15	BB9442966	SUPER RX PHARMACY #151	SAN DIEGO	OCEANSIDE	CA	92054	3,600
16	FT1382542	FAMILY PHARMACY	NYC	FAIRHURST	NV	89048	3,000
17	BF4827071	FOLLANSBEE PHARMACY	BROOKE	FOLLANSBEE	WV	26037	3,000
18	BO9878629	QUICK CHEK PHARMACY DEPT	OCEAN	BEACHWOOD	NJ	08722	3,000
19	BB9128516	BULLIVAN PHARMACY INC	BULLIVAN	LIBERTY	NY	12754	2,400
20	FH1614619	HARPER WOODS PHARMACY LLC	WAYNE	HARPER WOODS	MI	48225	2,400
21	BF3545704	FRUTH PHARMACY #16	PIKE	WAVERLY	OH	45690	2,400
22	PO1872844	QUICK CARE PHARMACY INC	SAN BERNARDINO	RANCHO CUCAMONGA	CA	91730	2,400
23	AP1653117	P & G PHARMACY INC	NASSAU	FARMINGDALE	NY	11735	2,000
24	FM2413780	MAST PHARMACY & SURGICAL	BURLINOTON	BORDENTOWN	NJ	08505	2,000
25	AO2494287	QUICK CHEK PHCY DEPT	HUDSON	BAYONNE	NJ	07002	2,000
26	BM1457642	MISSION PHARMACY	LOS ANGELES	LONG BEACH	CA	90613	2,000
27	AM2905935	M & B DRUG INC	KING	BROOKLYN	NY	11215	1,800
28	BF7447774	FARMACIA SAN ANTONIO	CAMDEN	CAMDEN	NJ	08105	1,800
29	POC792704	CHURCH SQUARE PHARMACY	CUYAHOGA	CLEVELAND	OH	44103	1,700
30	BB9732389	BASHAS UNITED DRUG #160	PIMA	TUCSON	AZ	85704	1,600
31	PA2650807	AGAHAFY PHARMACY INC	RIVERSIDE	SAN JACINTO	CA	92583	1,500
32	FT0748333	TOTAL PHARMACY AND COMPOUNDING SERVICES	HARRIS	HOUSTON	TX	77006	1,500

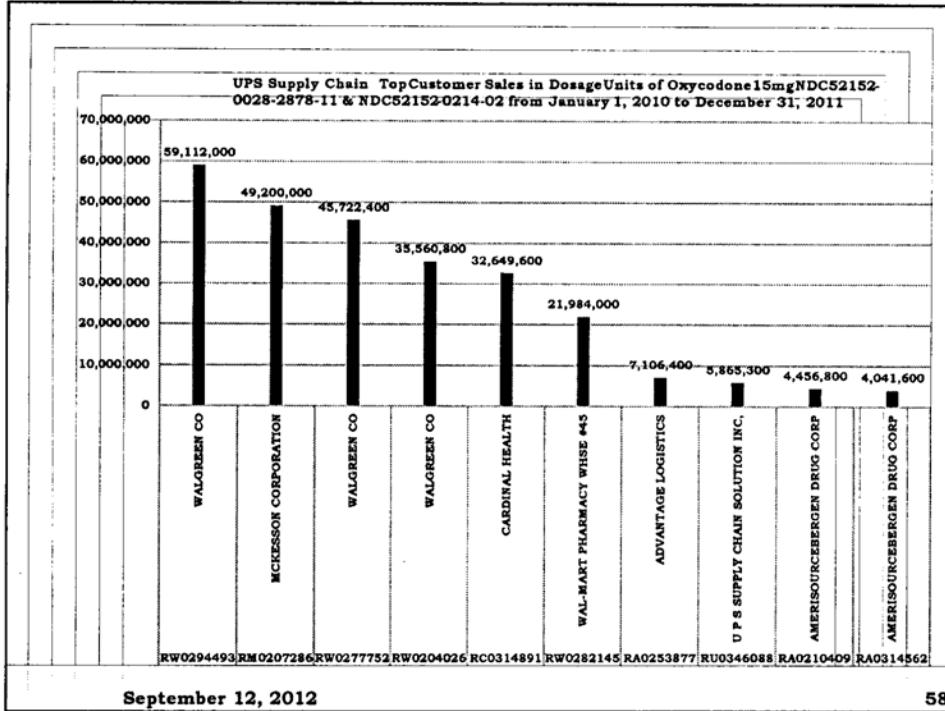
Top 50 Pharmacies Sales of Oxycodone 30mg (NDC 00228-2879-11)							
January 1, 2012 to June 30, 2012							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF7000526	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	628,100
2	BA2438505	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128	409,200
3	FT1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	279,200
4	FD0598207	DUANE READE	NEW YORK	NEW YORK	NY	10003	265,200
5	BF9649508	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919	227,400
6	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	193,800
7	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	165,600
8	BW4963977	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89030	156,100
9	BW3108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816	154,600
10	BW6630380	WAL-MART PHARMACY 10-2627	HILLSBOROUGH	TAMPA	FL	33612	154,300
11	PR1435355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	BOGALUSA	LA	70427	151,600
12	AKC221140	KEANSBURG DRUG	MONMOUTH	KEANSBURG	NJ	07734	149,100
13	BW6917972	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89032	143,500
14	BH0875040	HAPPY HARRY'S INC.	NEW CASTLE	WILMINGTON	DE	19806	143,400
15	BB6383169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917	138,700
16	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	137,700
17	PH1306984	HOPKINS PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	19128	136,800
18	AW5732119	WALGREEN ARIZONA DRUG CO.	PIMA	TUCSON	AZ	85712	136,600
19	BW8431707	WALGREEN CO.	CLARK	LAS VEGAS	NV	89107	134,800
20	PH0825513	HUMANA PHARMACY INC DBA RIGHTSOURCE	BUTLER	WEST CHESTER	DE	45069	132,900
21	BH4285509	HEALTHWIRE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614	132,900
22	BW4986622	WALGREEN CO.	CLARK	LAS VEGAS	NV	89108	132,800
23	BW4319038	WALGREEN CO.	BLOUNT	ALCOA	TN	37701	132,300
24	BW5727791	WALGREEN CO.	CLARK	LAS VEGAS	NV	89121	131,000
25	BW0882987	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	129,600
26	BS7719795	BHAYONA PHARMACY	MIDDLESEX	PERTH AMBOY	NJ	08861	128,600
27	BW6842656	WALGREEN EASTERN CO., INC.	SUFFOLK	SELDEN	NY	11784	120,100
28	BD1649978	DINNEY PHARMACY SERVICES	KNOX	POWELL	TN	37849	119,700
29	FW1672422	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10305	116,500
30	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	115,100
31	BW8855682	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10313	114,700
32	AW430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	113,800
33	BW837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	112,100
34	BT5419053	THE HOMETOWN PHARMACY	LAWRENCE	NEW CASTLE	PA	16101	111,000
35	BW7249623	WALGREEN CO.	CLARK	LAS VEGAS	NV	89106	110,800
36	BP9744524	PRESCRIPTION SOLUTIONS BY OPTUMRX	SAN DIEGO	CARLSBAD	CA	92010	110,800

The following charts and graphs have been compiled from ARCOS reports your firm has previously submitted to DEA. The data was reviewed and the purchases of a few of your customers will be addressed during our discussion.

The mentioning of specific customers is NOT to be implied that the sale of controlled substances to these customers is illicit or that they may be involved in illicit activities.

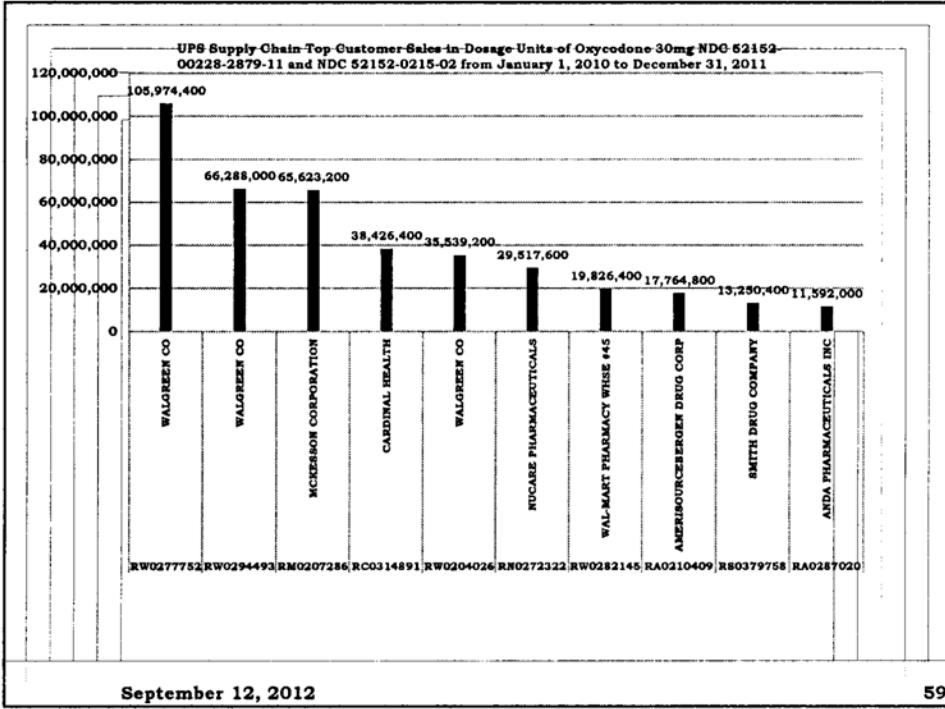
It also should NOT be inferred that based upon the documentation provided to you that your company should terminate or restrict business with any customer discussed for the purposes of this presentation.

It is incumbent upon you to know your customers, fully review all orders for controlled substances and to exercise due diligence procedures prior to deciding whether or not to terminate or restrict sales to any customer.



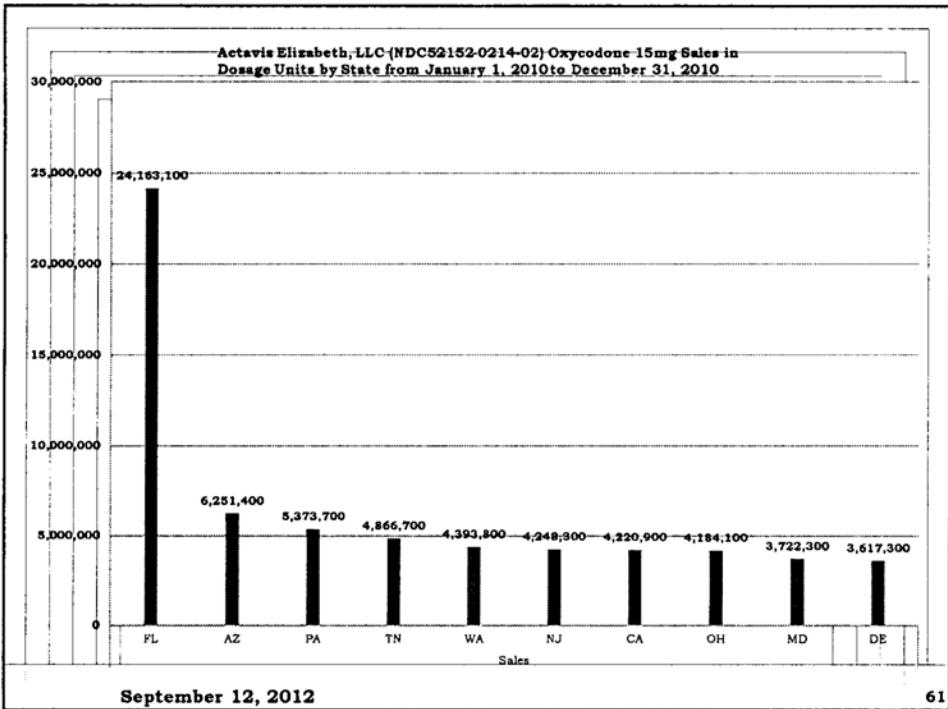
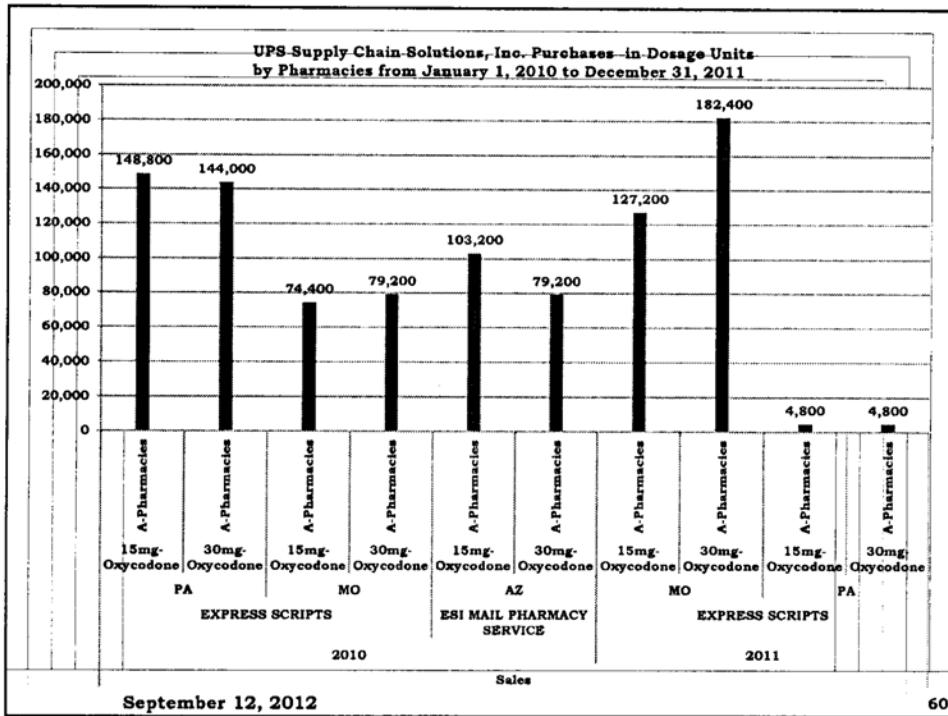
September 12, 2012

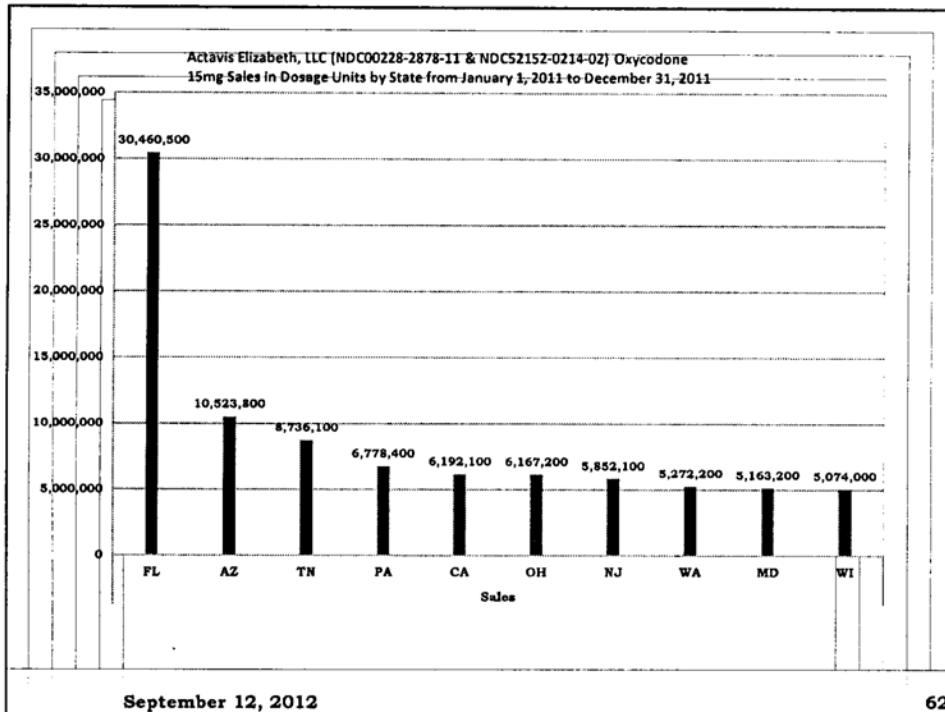
58



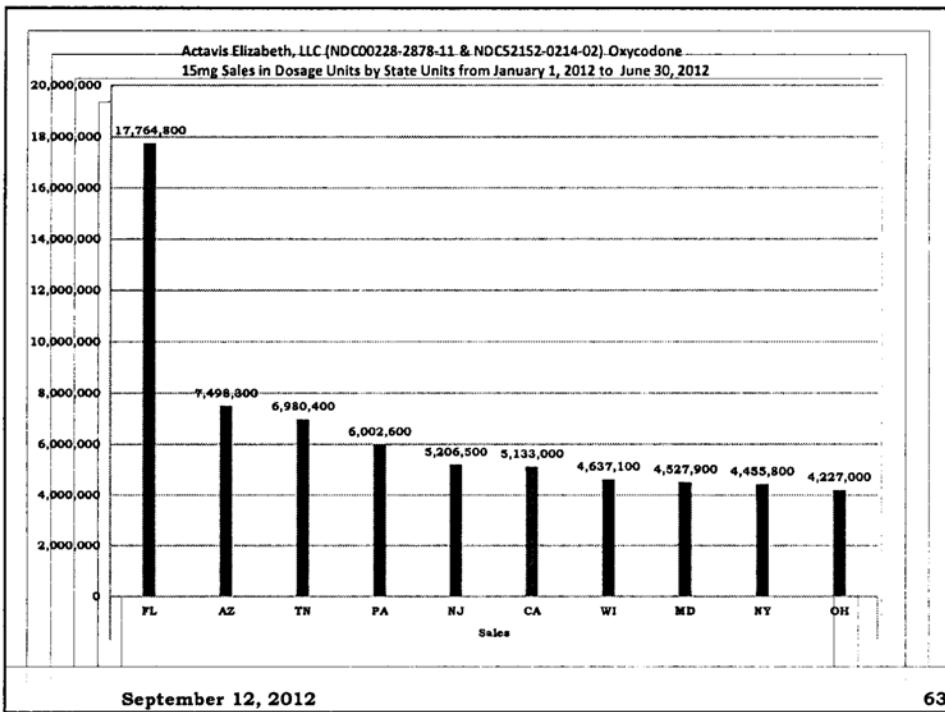
September 12, 2012

59

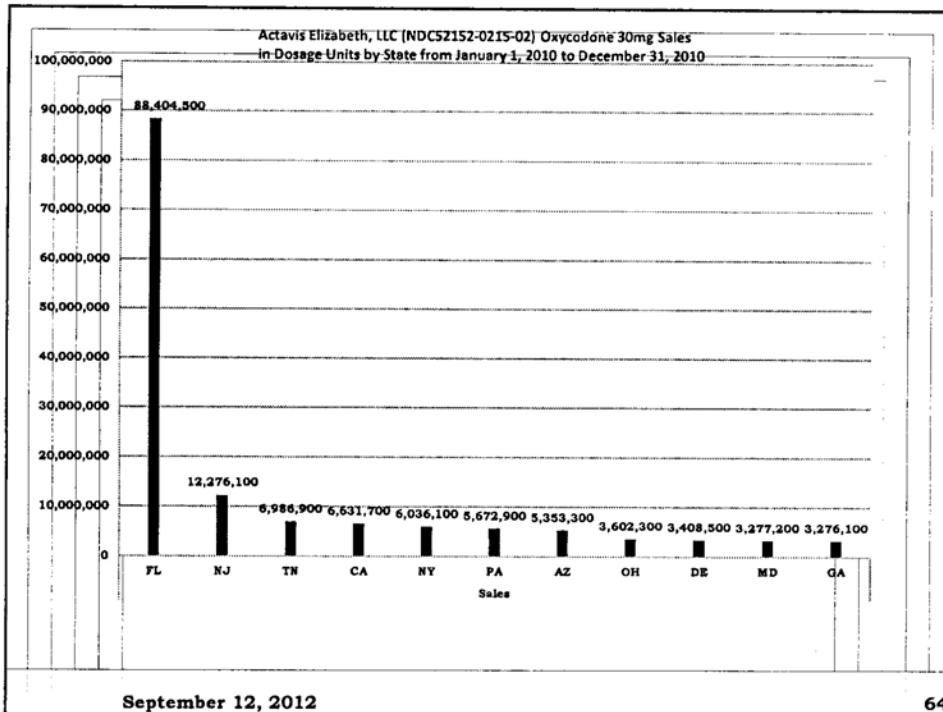




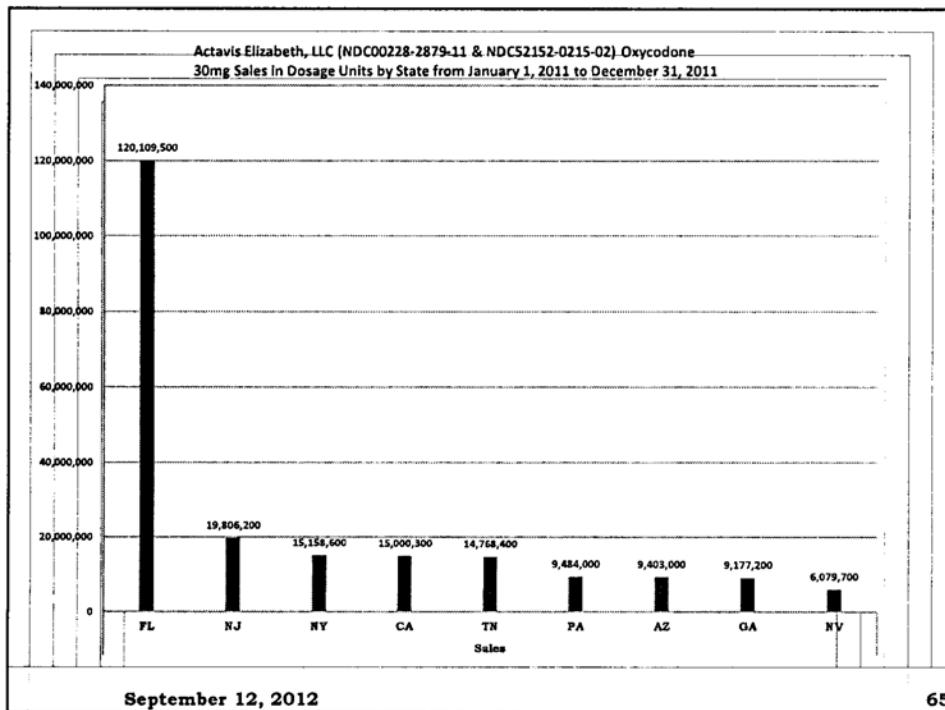
62



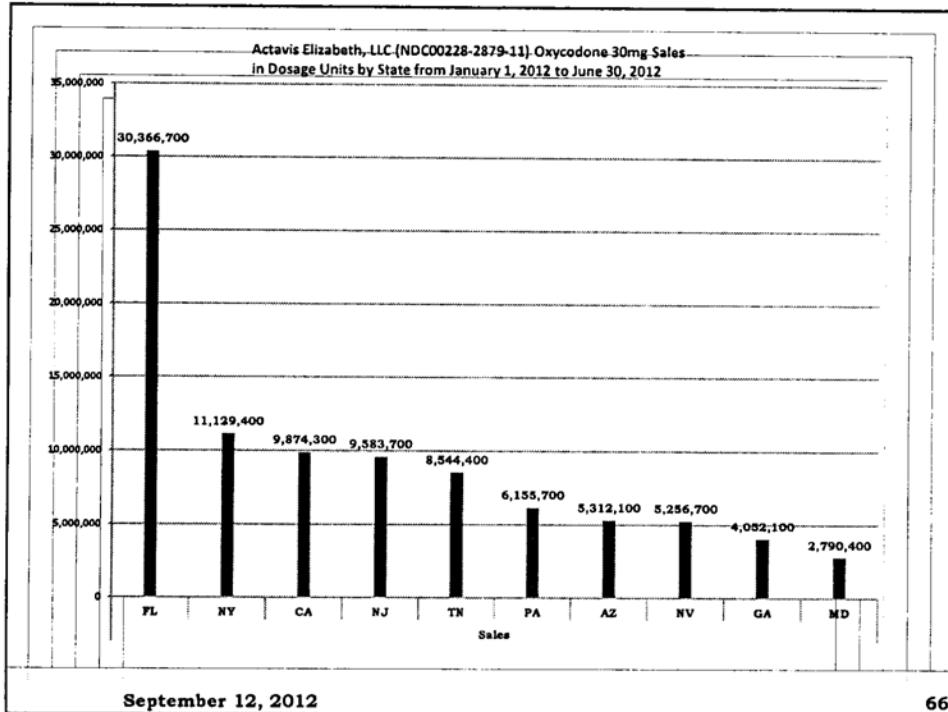
63



64

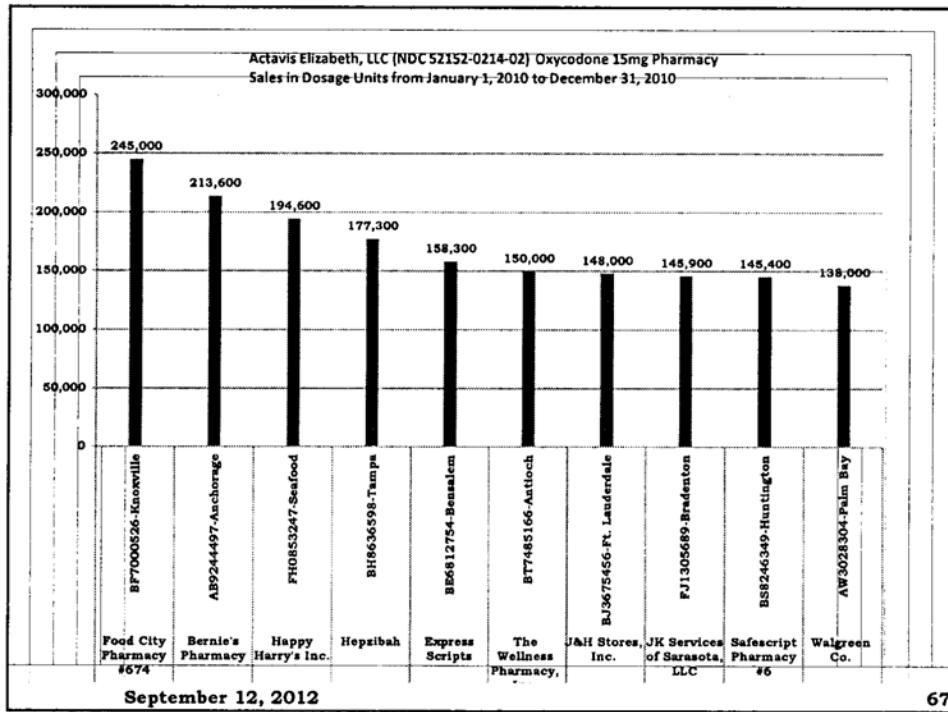


65



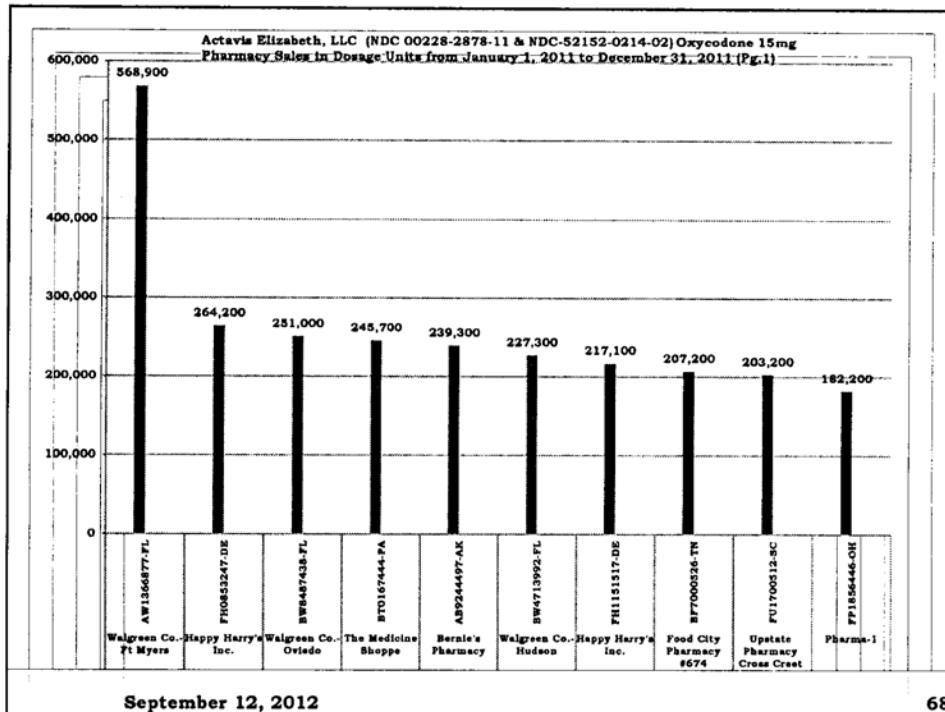
September 12, 2012

66



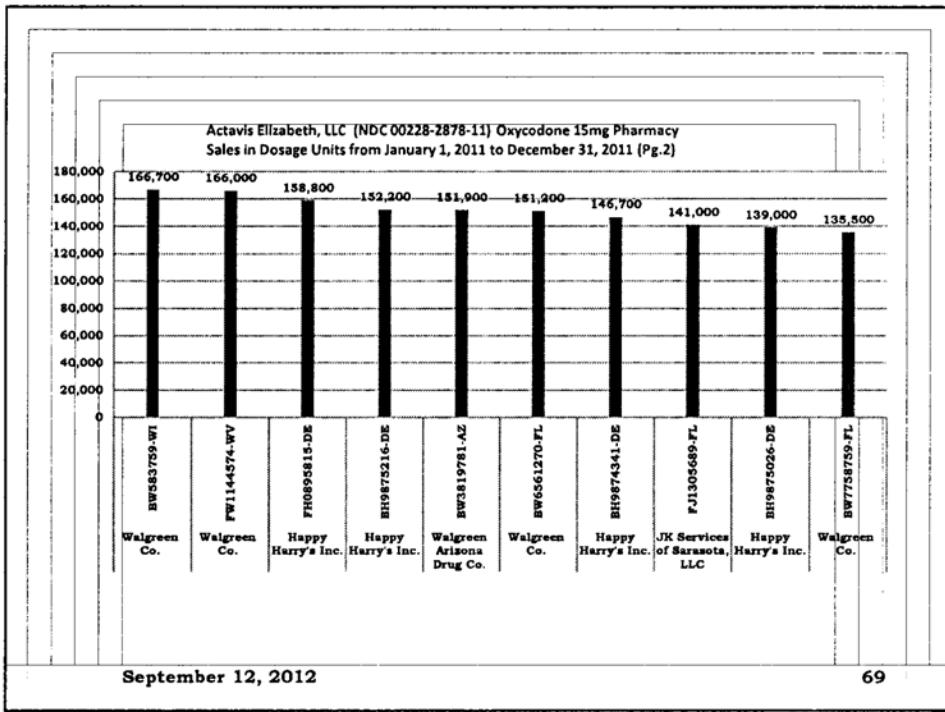
September 12, 2012

67



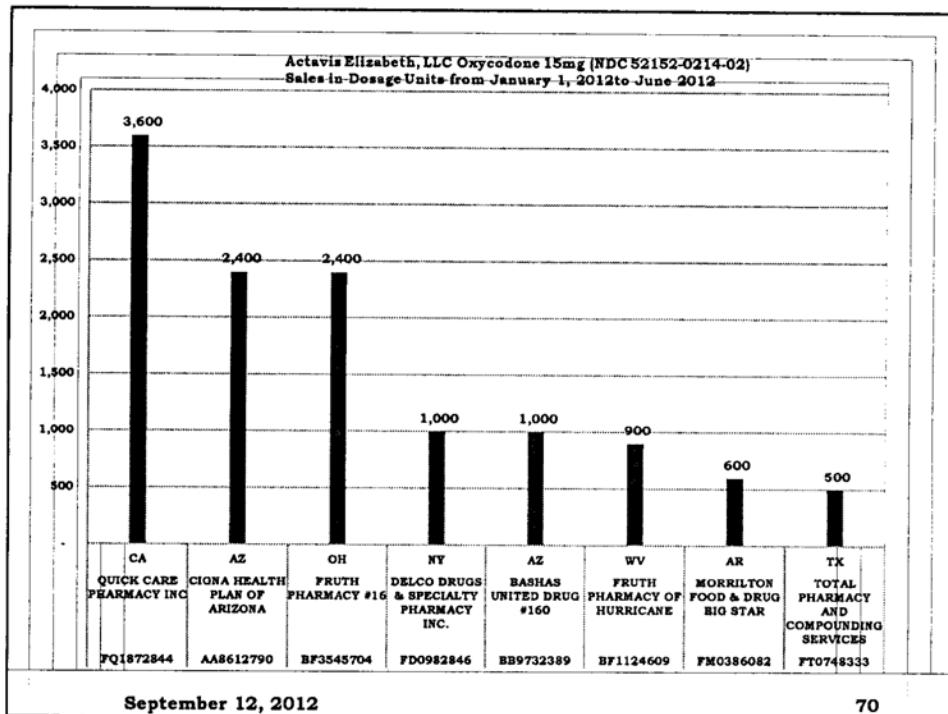
September 12, 2012

68

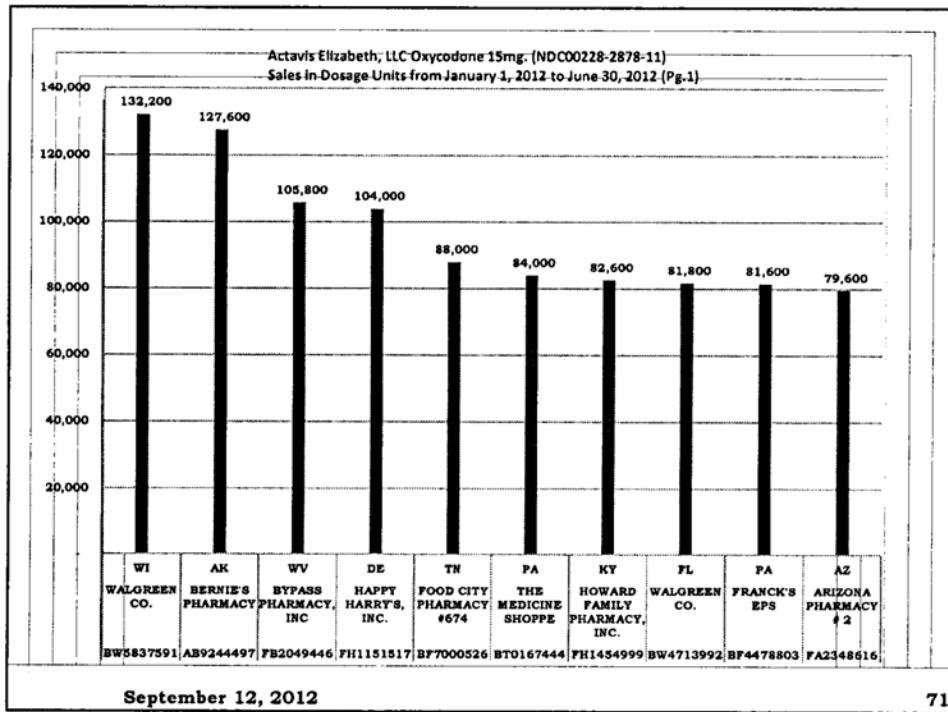


September 12, 2012

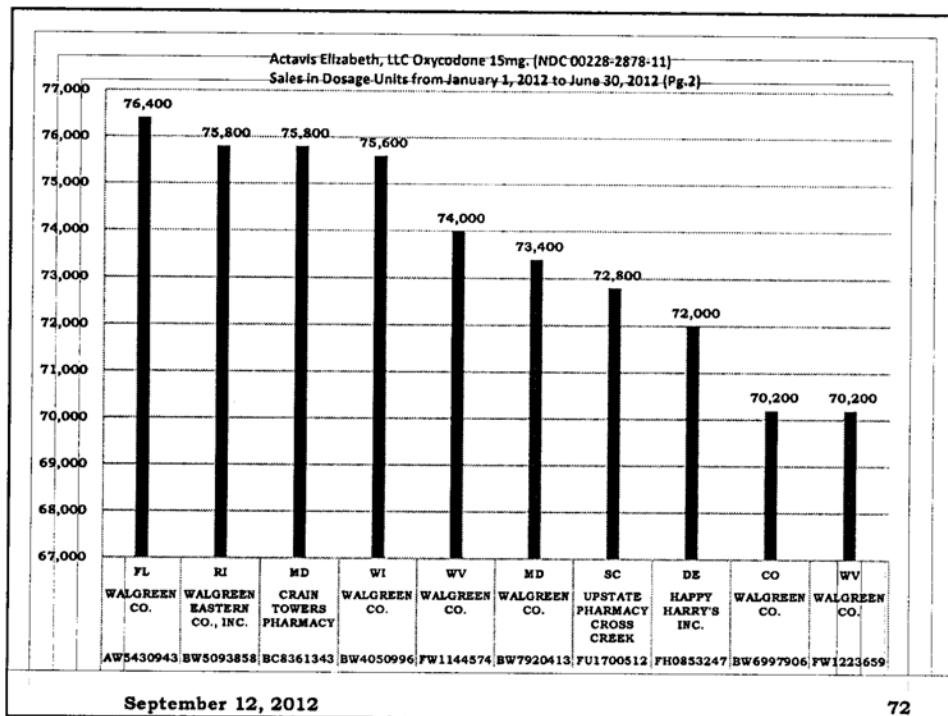
69



70

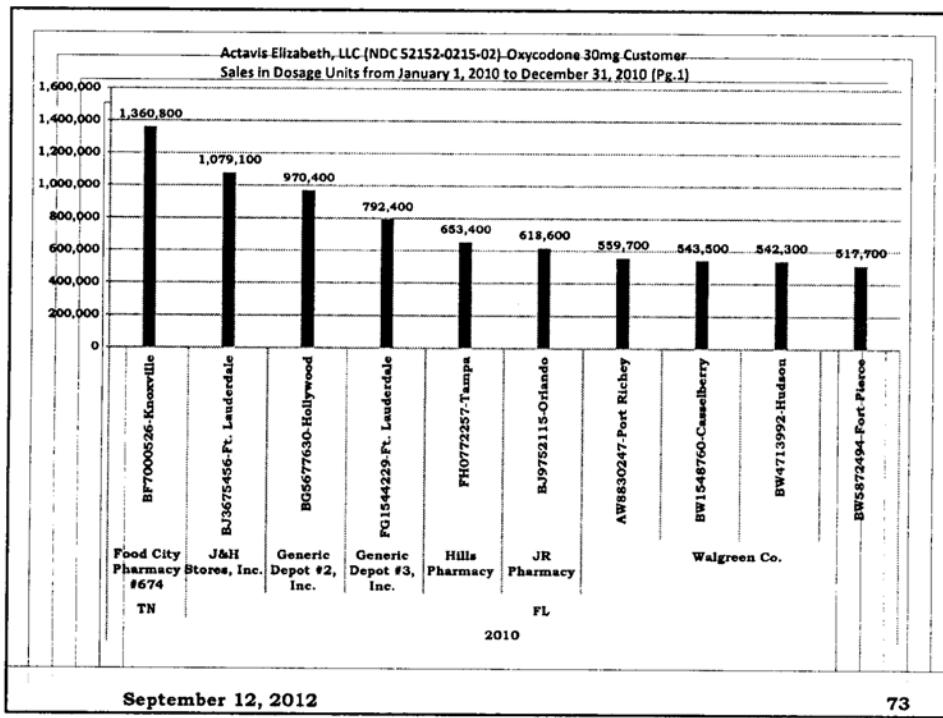


71

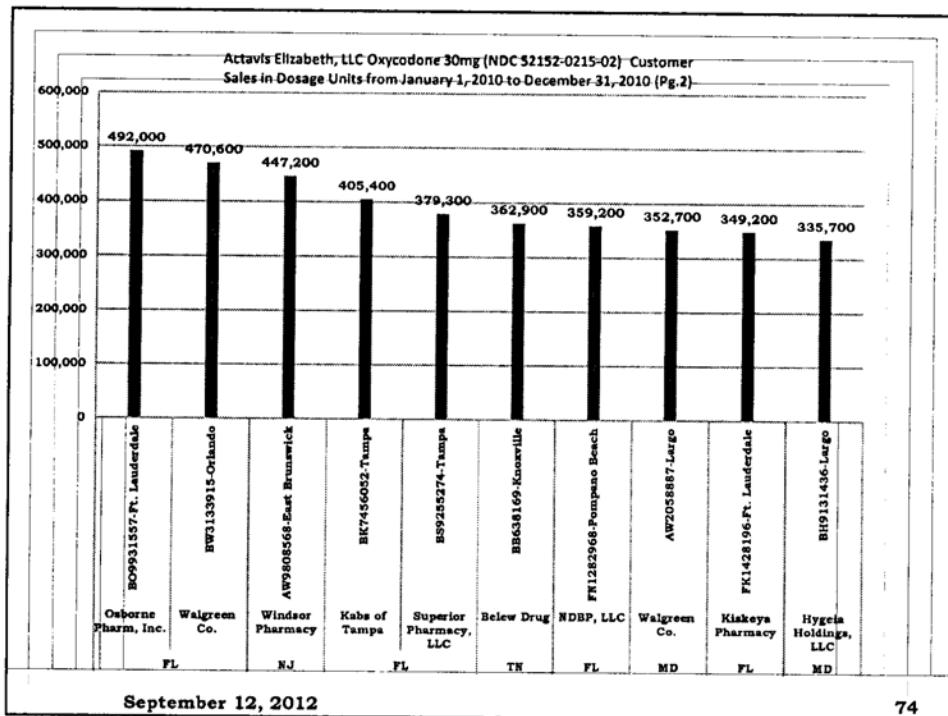


September 12, 2012

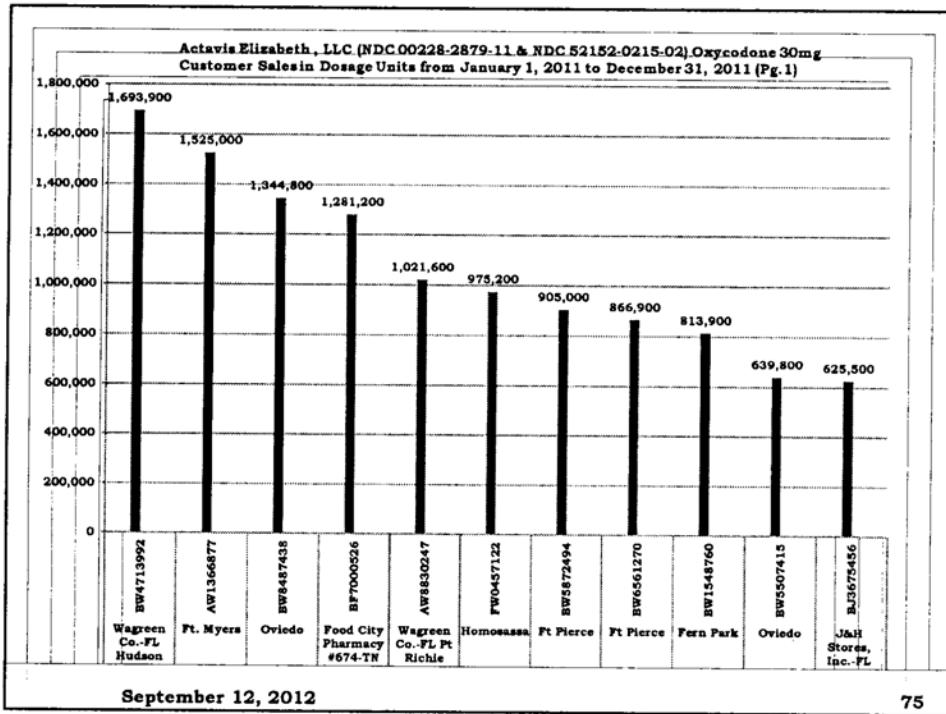
72



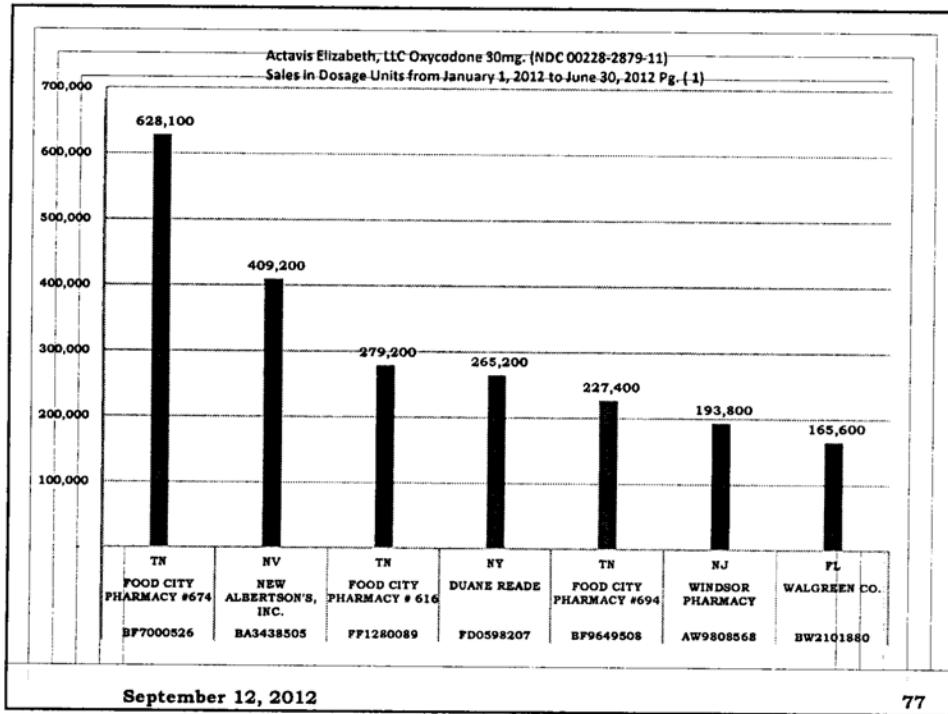
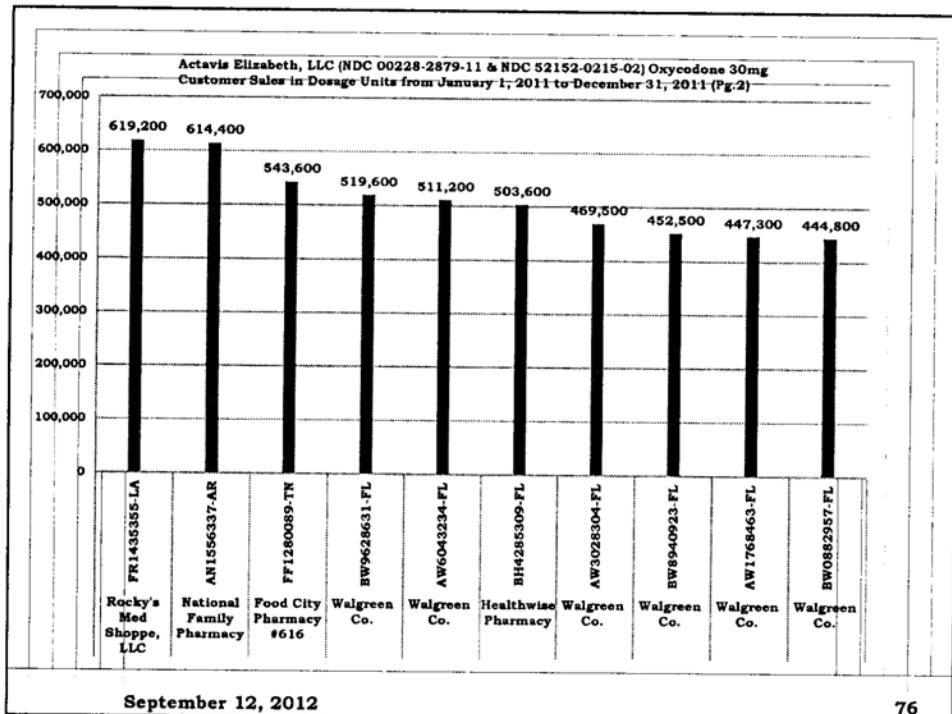
73

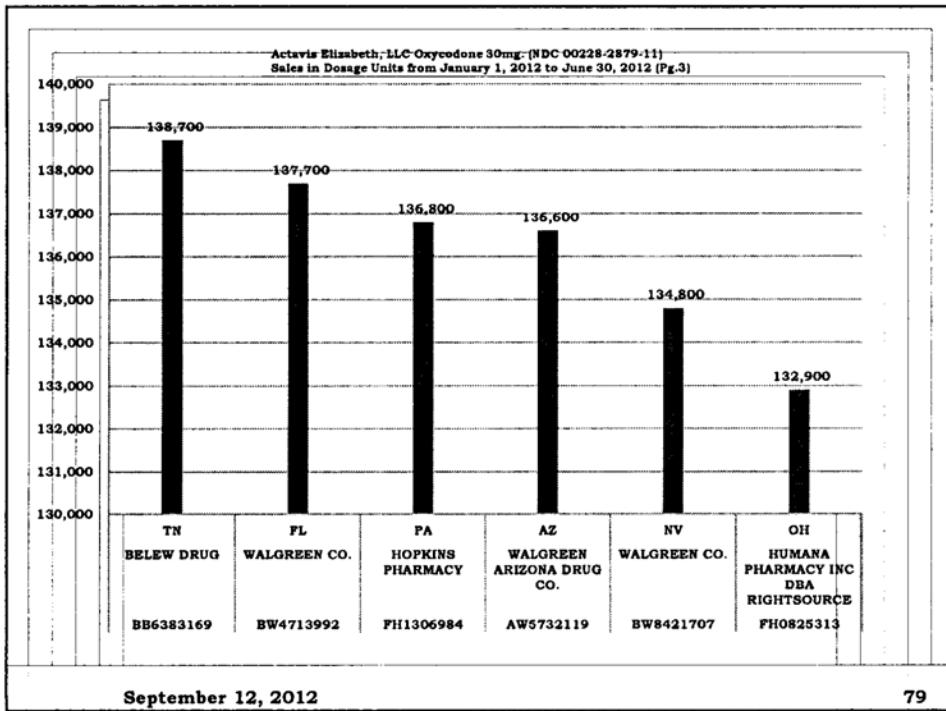
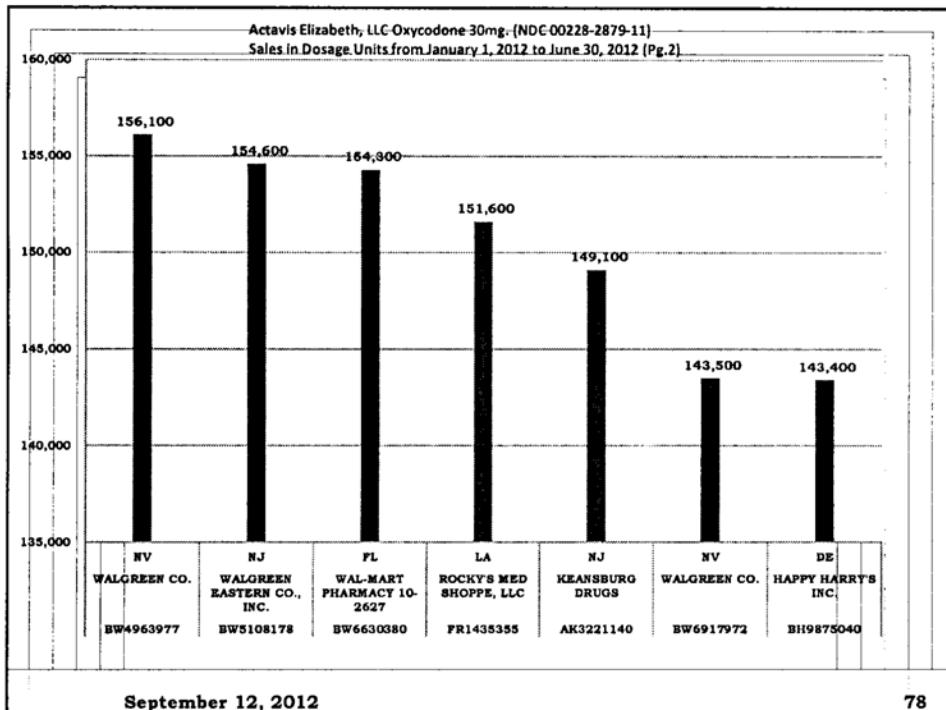


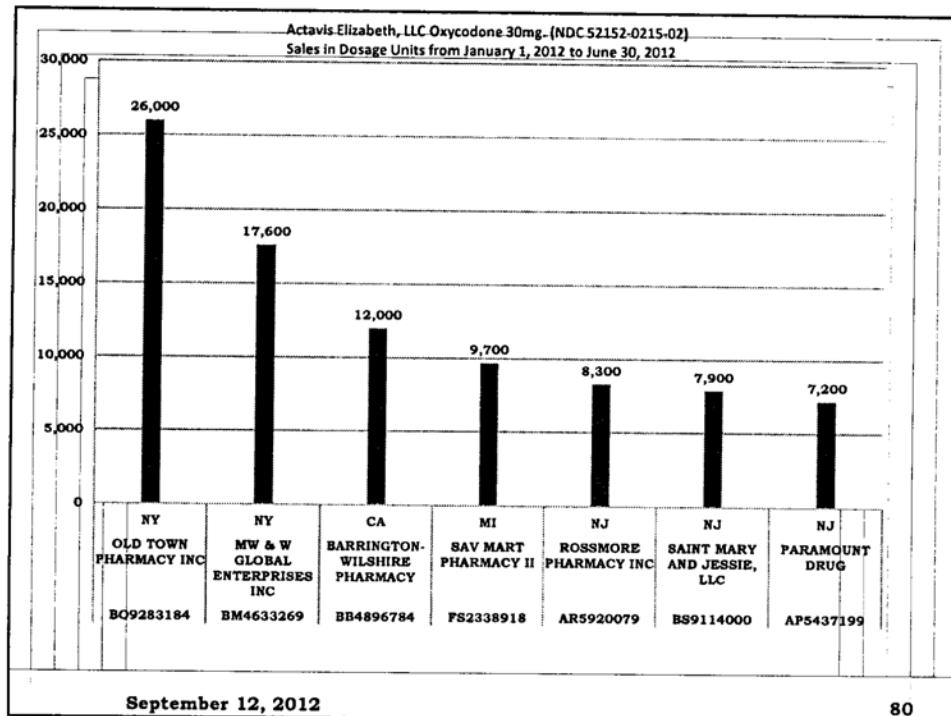
74



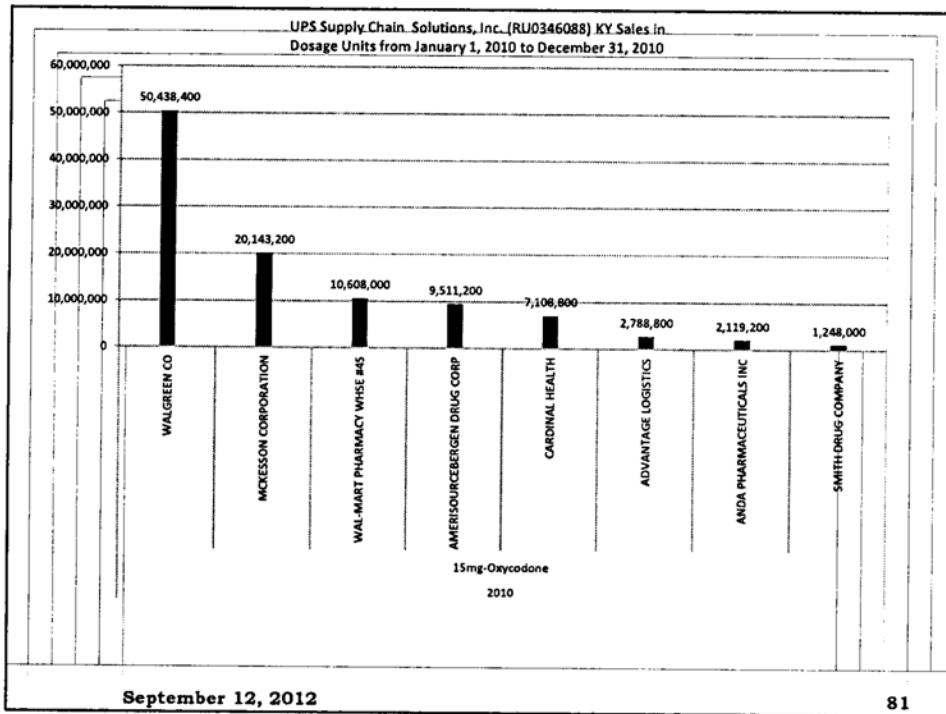
75



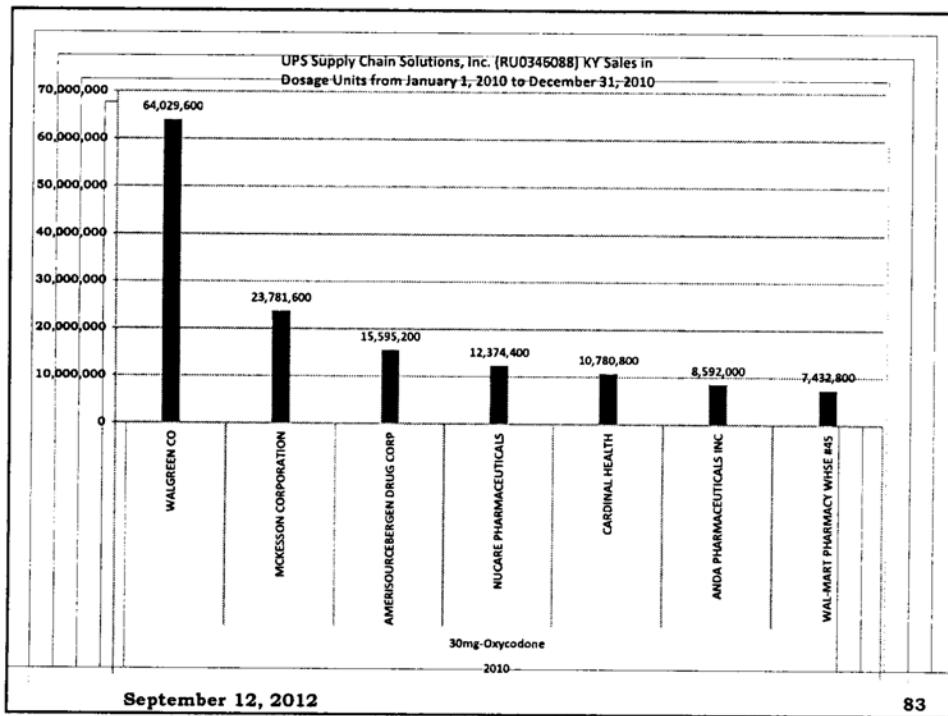
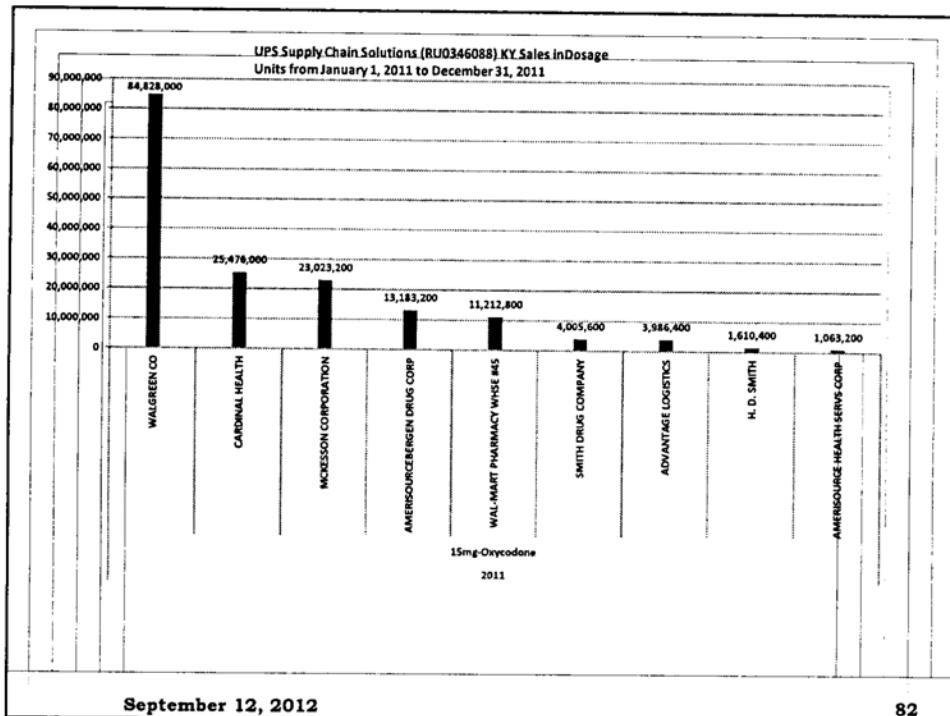


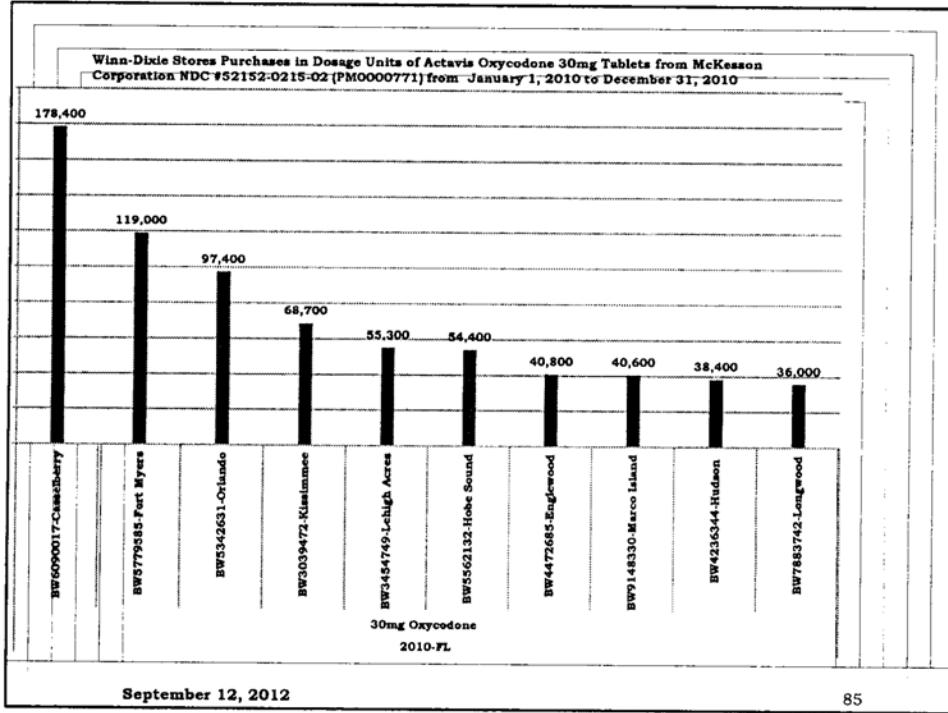
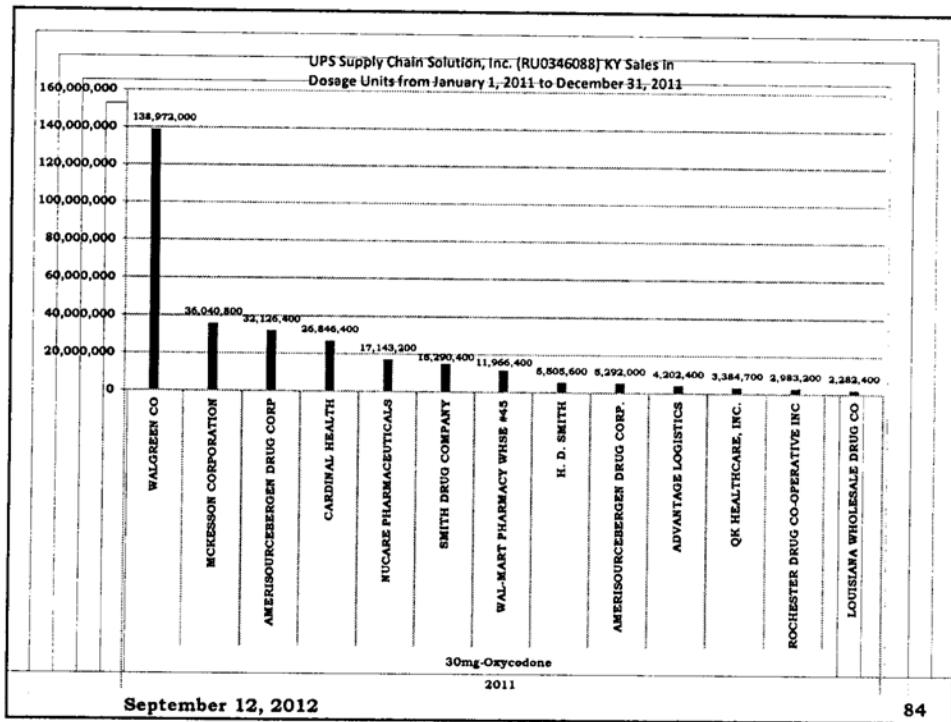


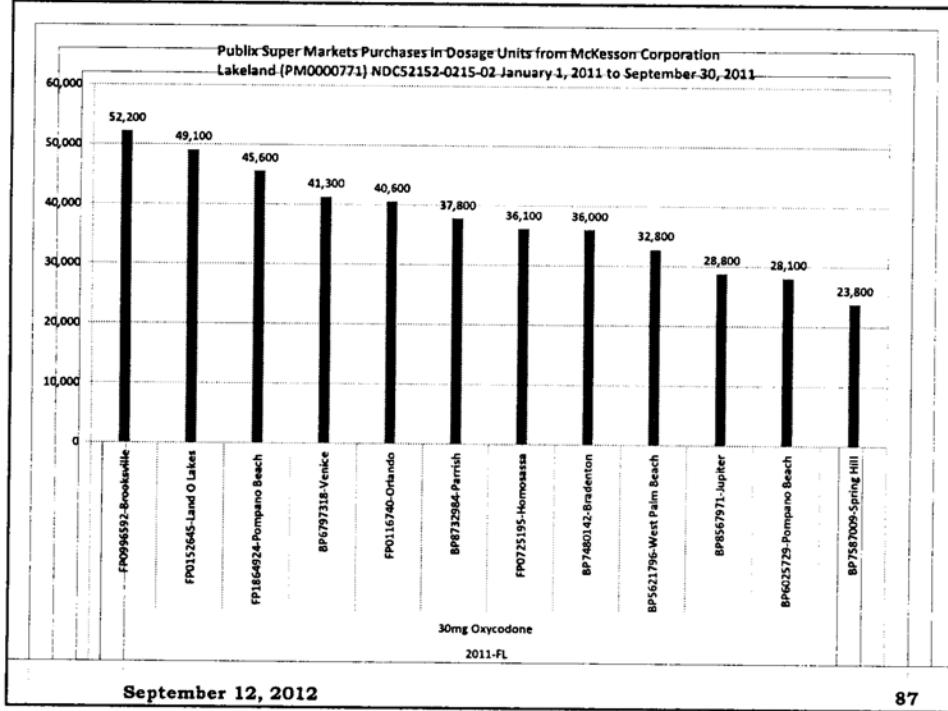
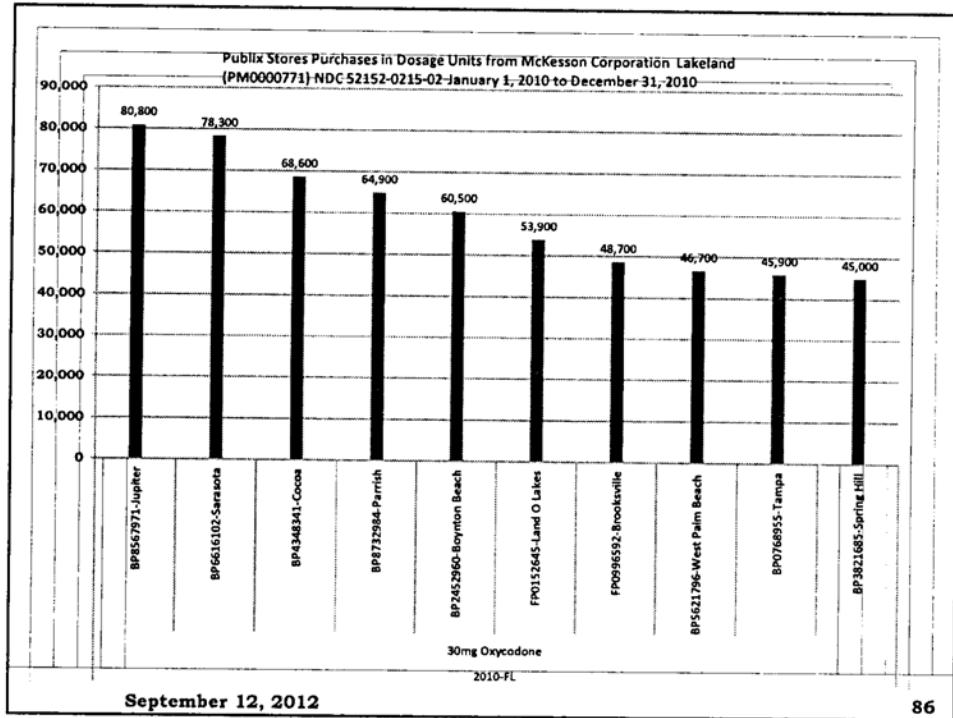
80

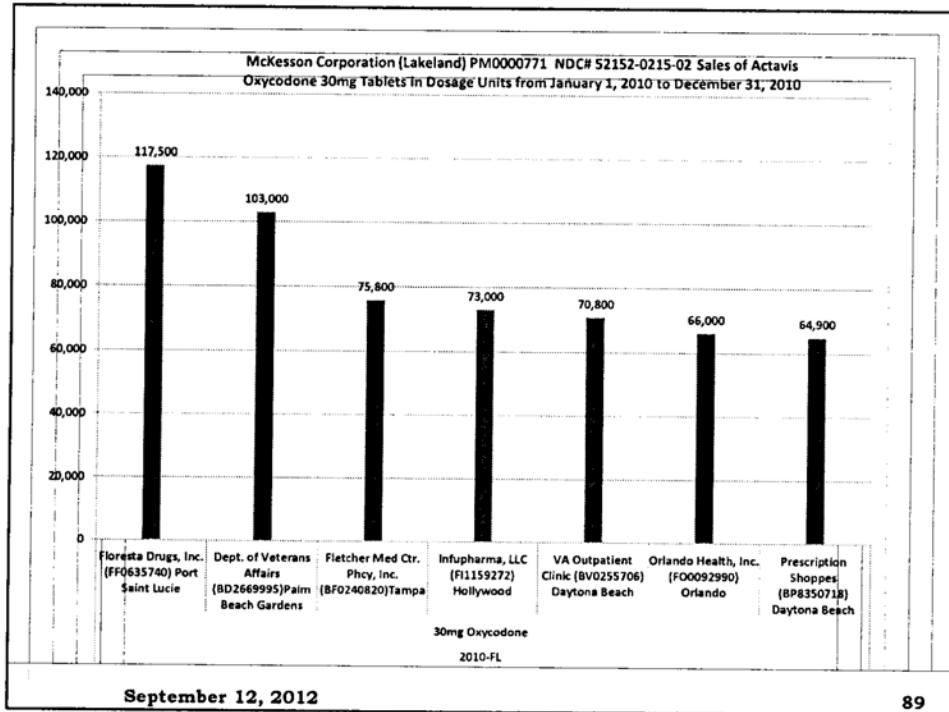
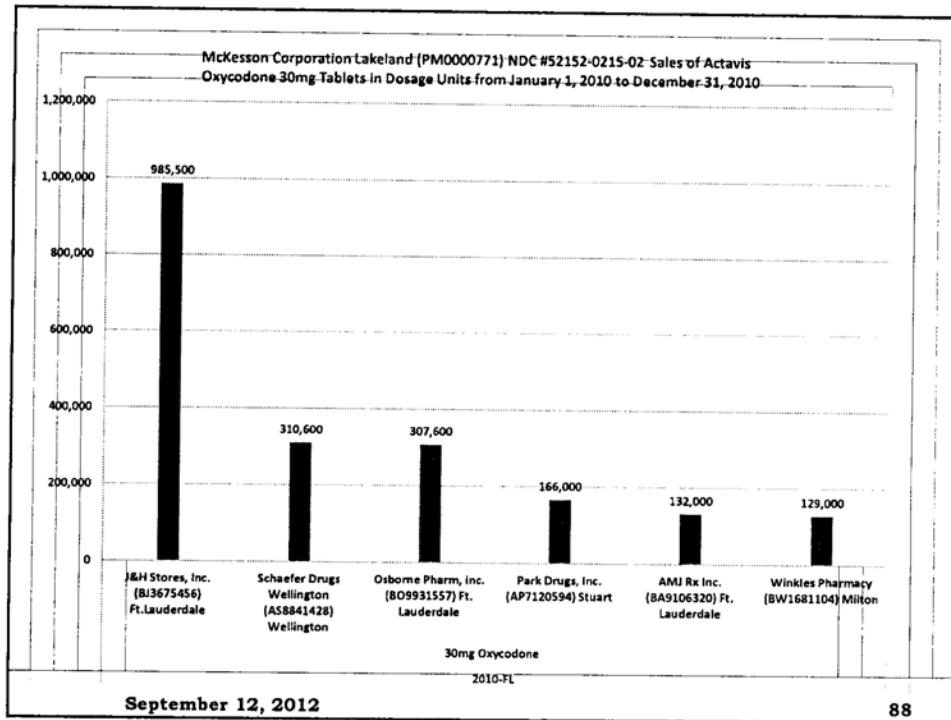


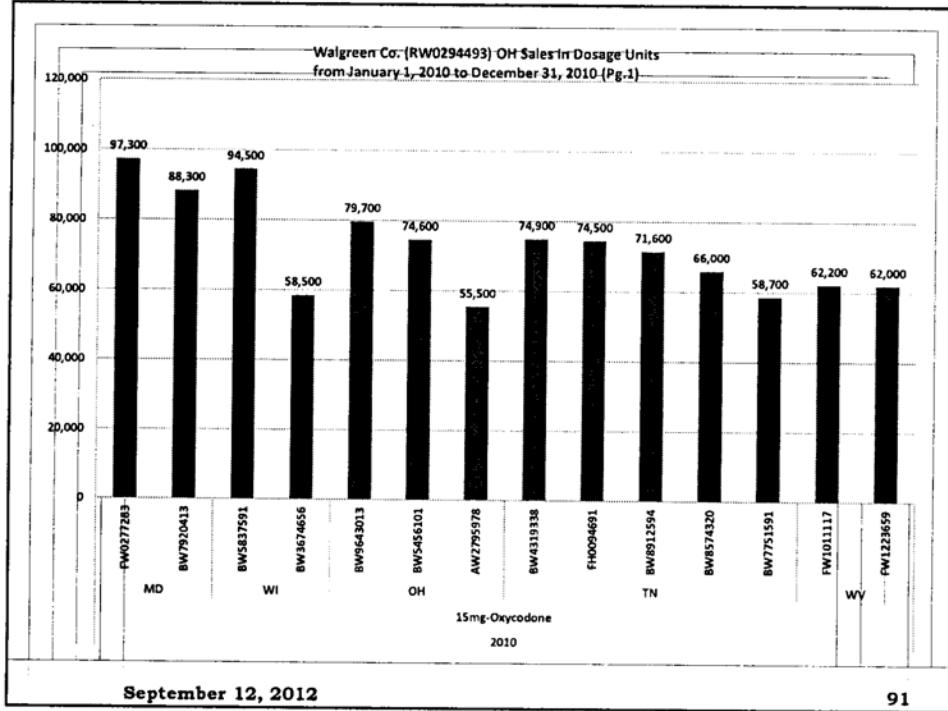
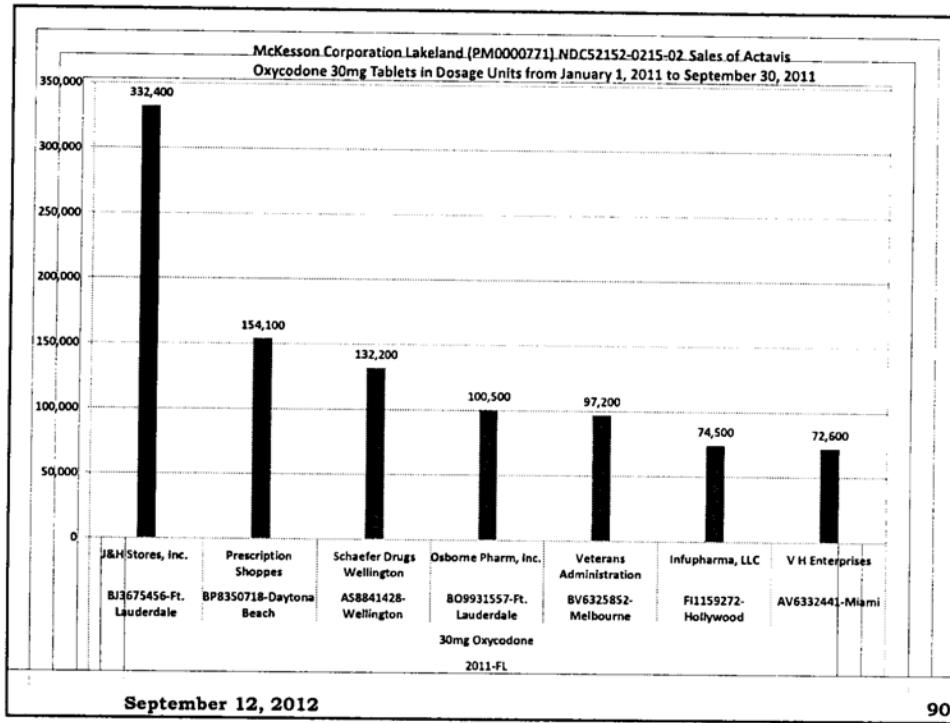
81

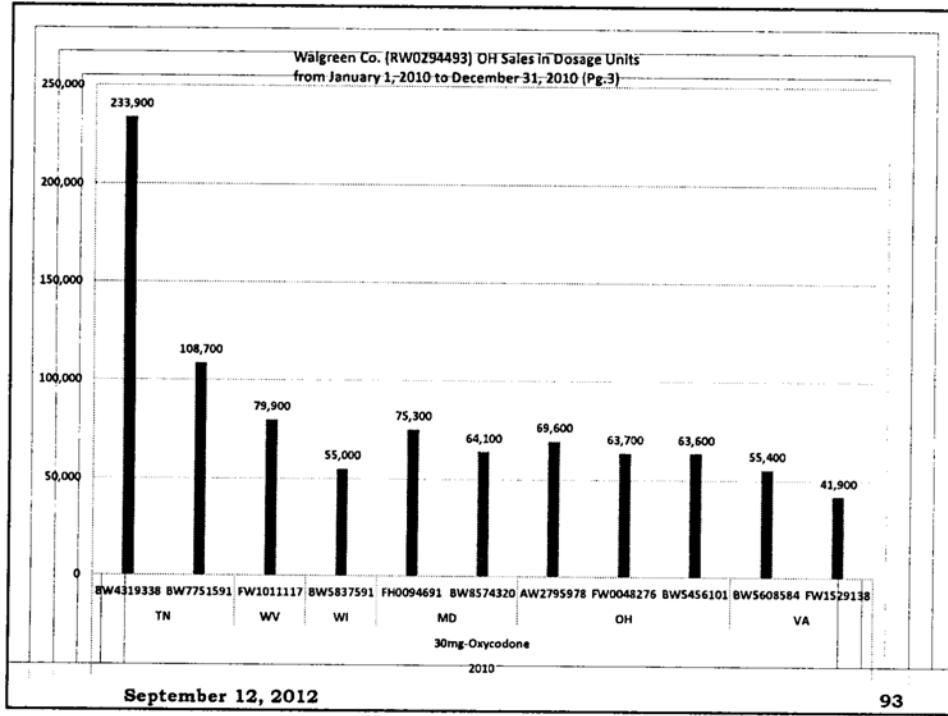
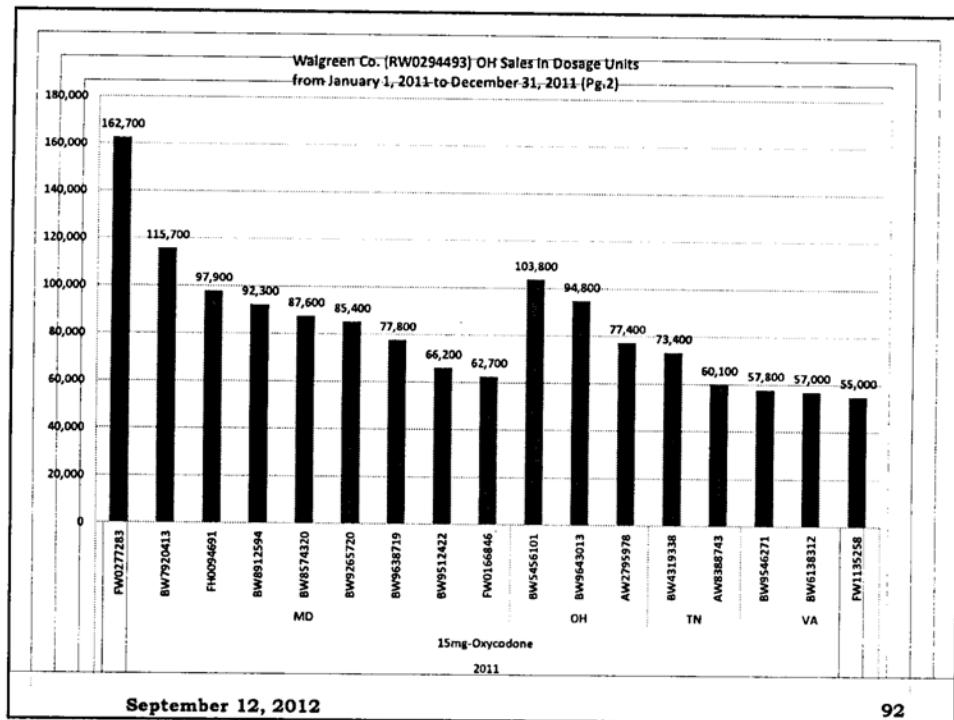


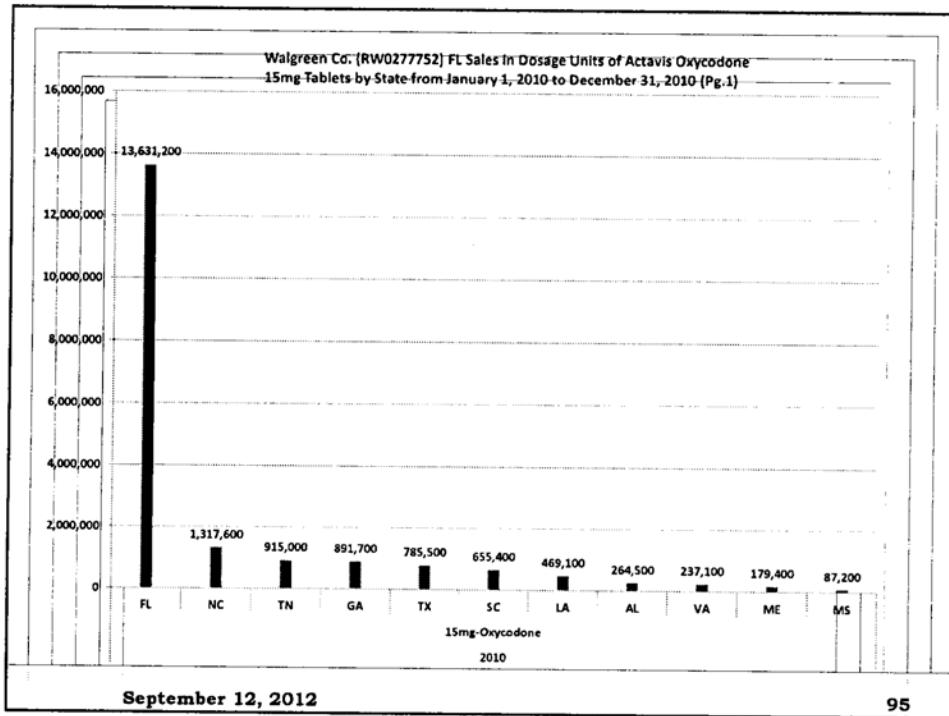
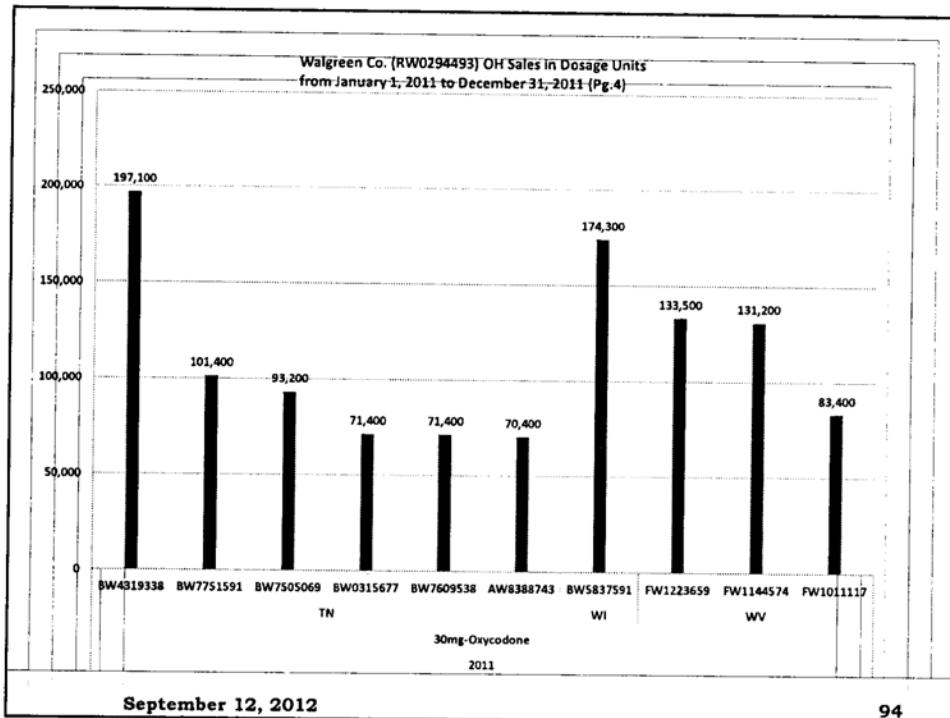


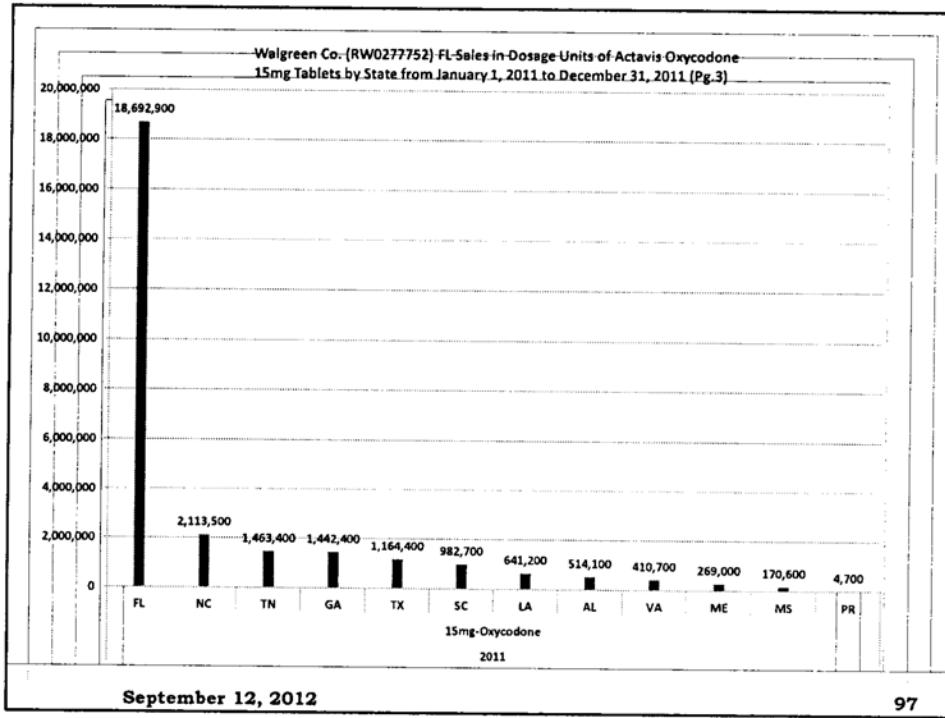
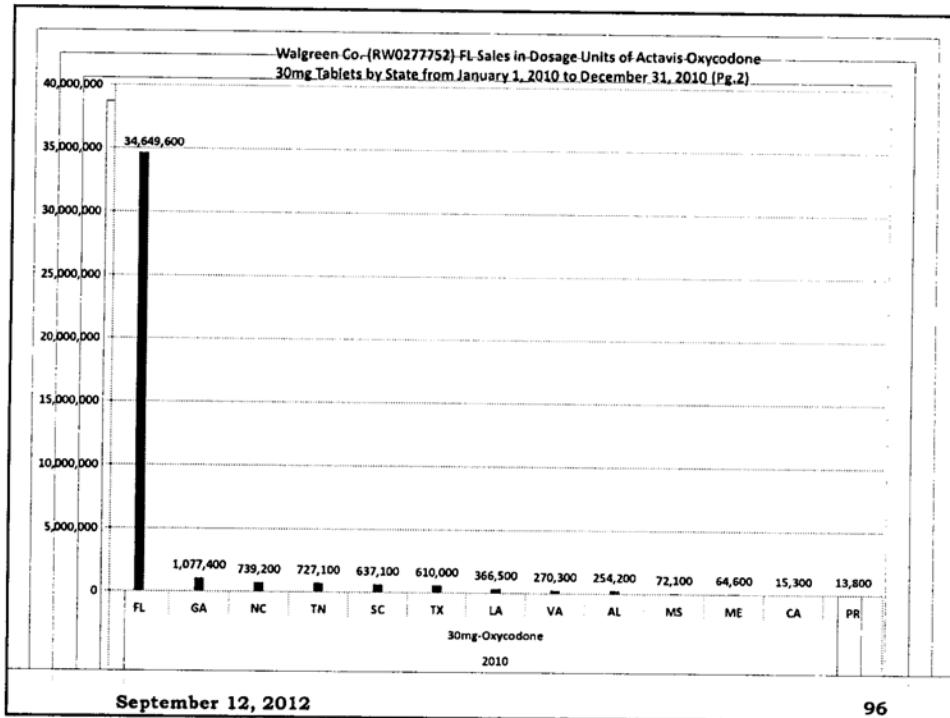


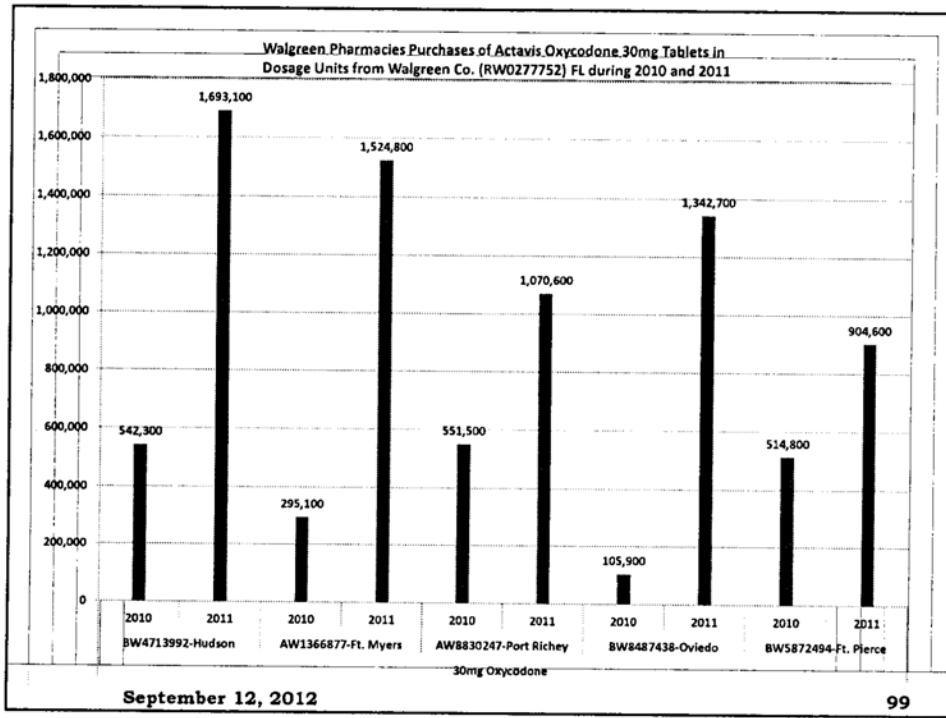
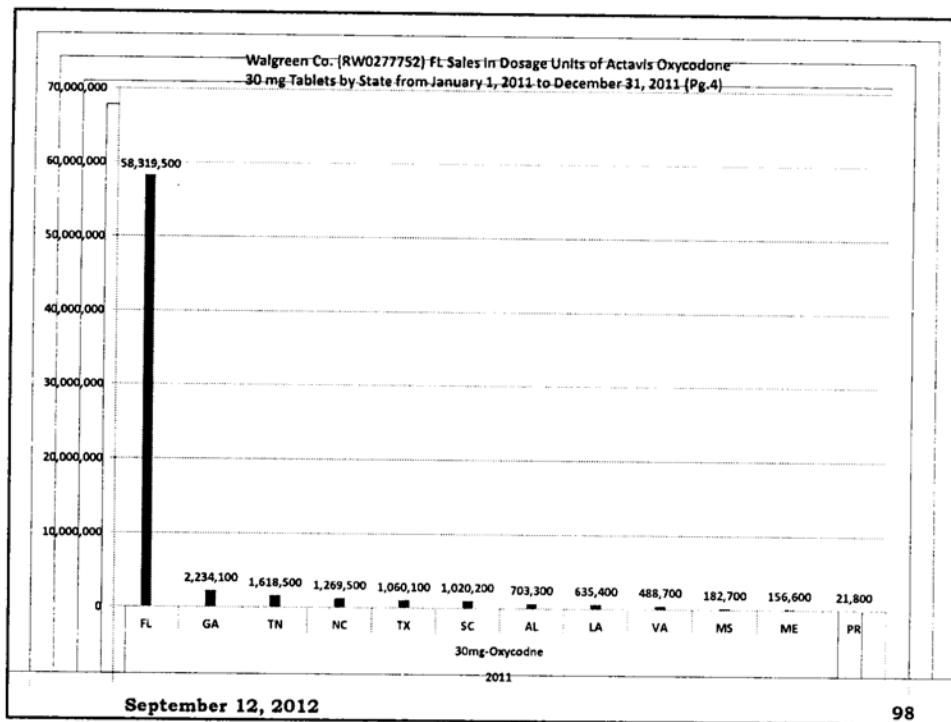


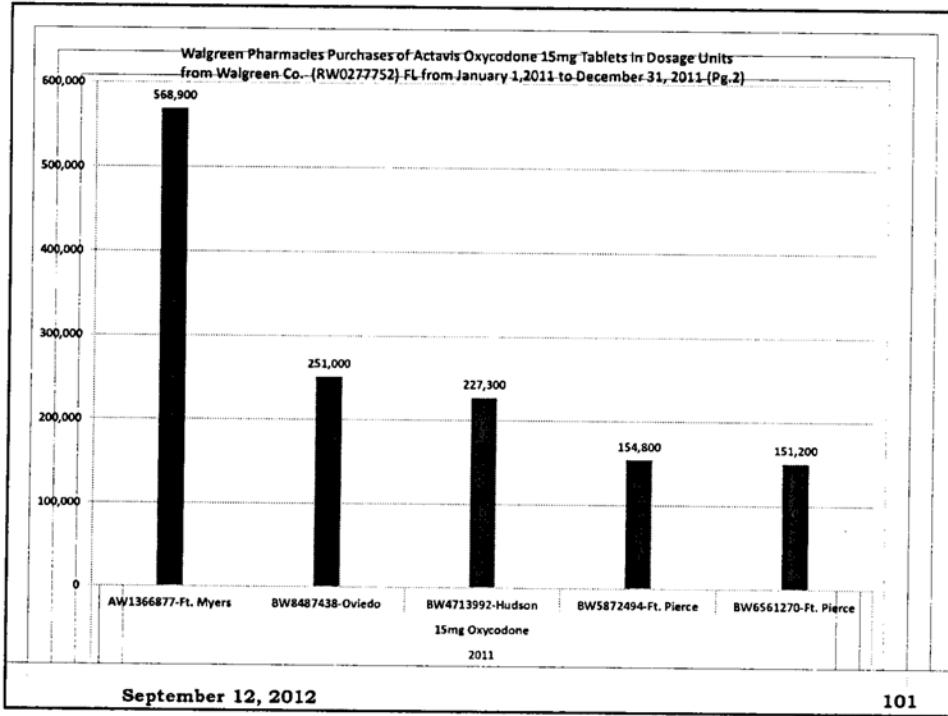
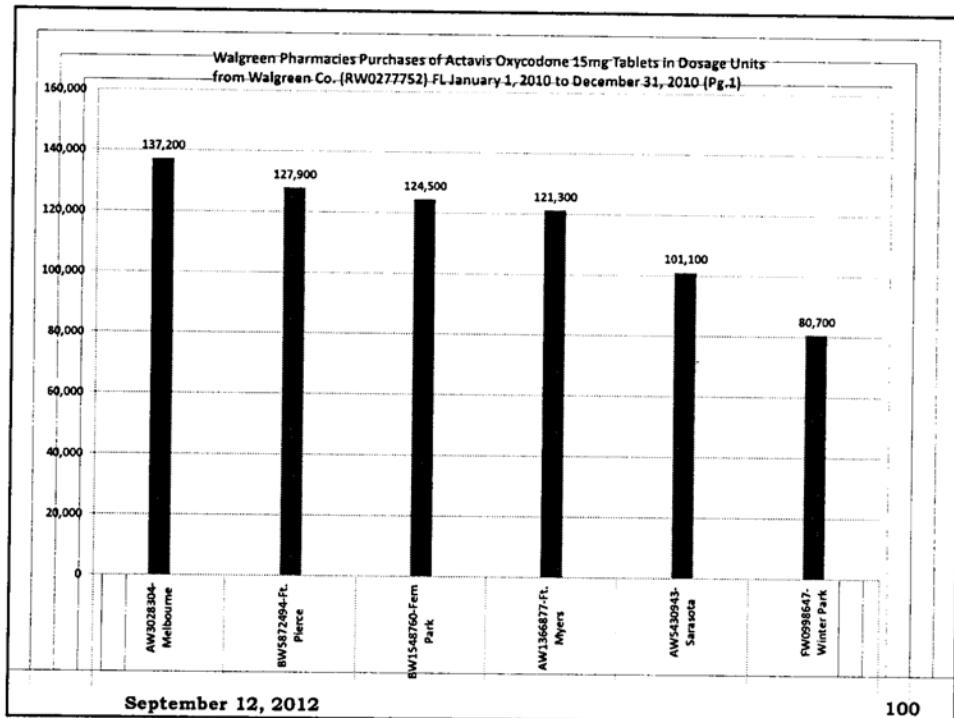


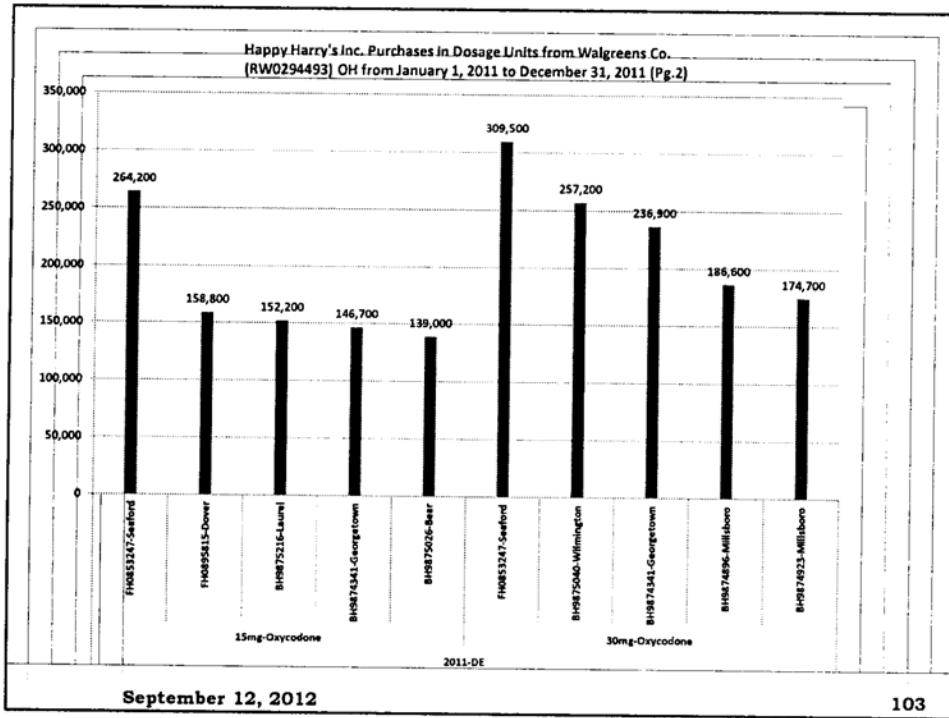
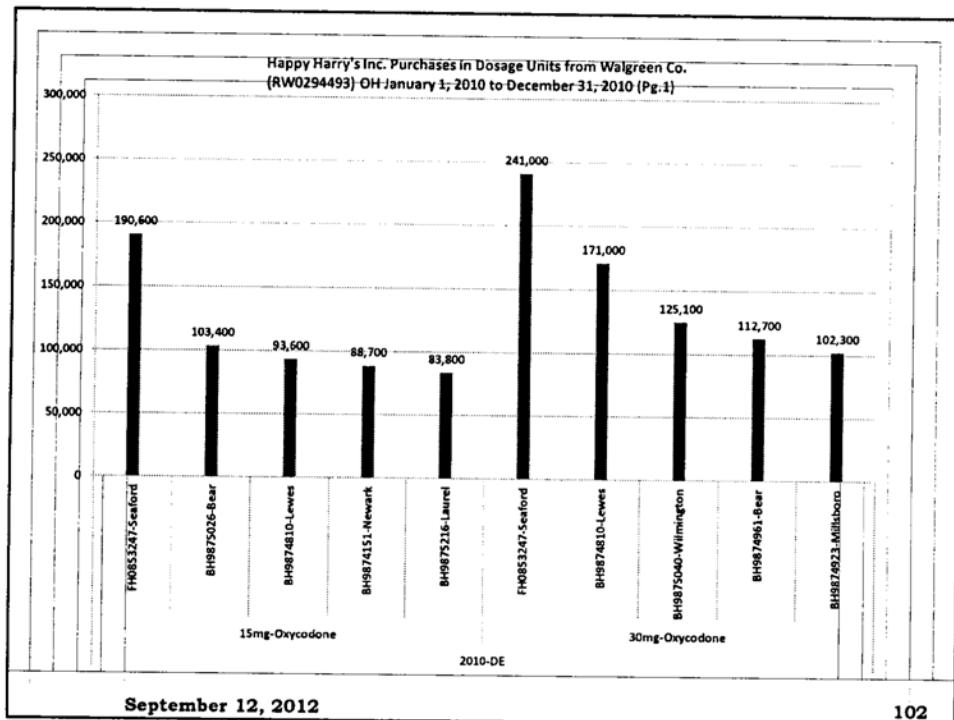












Suggested Questions a Distributor should ask prior to shipping controlled substances.

This list of questions is not intended to be all inclusive nor should it be interpreted that every situation or registrant activity is covered. This questionnaire is provided to assist the distributor to formulate a better understanding of who their customers are and whether or not they should sell to them controlled substances. It is incumbent upon you, the distributors, to ensure that sales to your customers are for legitimate purposes. It is further incumbent upon you to identify illicit or suspicious activities which may result in the diversion of controlled substances.

The use of this questionnaire should not be construed in any manner to be a mechanism or means that you have fully met the criteria and actions required by 21 USC 823 or other state and federal laws that are applicable.

Possible questions for a pharmacy:

- Does the pharmacy fill prescriptions via the Internet? If so, is the pharmacy registered with the DEA under the Ryan Haight Act?
- Is this a mail order pharmacy (fills prescriptions for insurance, etc.)?
Note: A pharmacist may claim to be mail order pharmacy but may actually be operating as an Internet pharmacy. Do not accept the response to this question at face value.
- Is the pharmacy licensed in all states for which it mails or fills prescriptions?
- Does the pharmacy report to all states that have prescription monitoring programs in which their customers reside and to whom they dispense?
- Does the pharmacy provide services for any specialty customers such as Long Term Health Care, Hospice Centers, Assisted Care Living Facilities, etc.?
- Does the pharmacy have staff or a private firm that solicits practitioners to get more business?
- What is the pharmacy's ratio of controlled vs. non-controlled orders?
- Does the pharmacy order a full variety of controlled substances and are they fairly evenly dispersed? If not, why the disparity?
- What are the hours of operation of the pharmacy?
- Does the pharmacy offer a full assortment of sundries to its customers (e.g., aspirin, snacks, cosmetics, etc.)?
- Does the pharmacy have security guards on the premises? If so, why?
- What methods of payment does the pharmacy accept (cash, insurance, Medicaid, and in what ratios)?
- Who is the pharmacy's primary supplier?
- Does the pharmacy order from other suppliers as well? If so, why and what controlled substances?
- If this is a new account, why does the pharmacy want you to be their supplier?